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ABSTRACT

Vocational education services provided to Navajo people are examined in this study. Three major purposes are presented: to develop a complete picture of vocational education programs offered to Navajos, and determine whether funds are allocated in an equitable manner; to identify where critical decisions concerning vocational education programs are made; and to analyze existing vocational education services in relation to job opportunities presently available. Chapter I provides an overview of the problems of the Navajo Nation. Chapter II describes the Federal Vocational Education Act of 1963 and emphasizes funding allocation criteria. Chapter III examines federal and state funding to secondary level vocational education in Arizona and New Mexico, and chapter IV describes vocational education funding and decision making in the postsecondary institutions on or near the reservation. Chapter V deals with CETA (Comprehensive Employment and Training Act) funds for the Navajo people. Chapter VI examines vocational education in the Bureau of Indian Affairs; chapter VII analyzes Navajo vocational education programs versus labor market needs; chapter VIII describes in detail provisions regarding Indians in recently passed vocational education legislation; and chapter IX summarizes the findings of the study and makes specific recommendations to each of the key agencies (federal, state, local, and tribal). (BL)

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Vocational Education on the Navajo Reservation: Present Status and Future Directions

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Martin J. Blank
Jill M. Codoff
Roslyn D. Kane

Rj Associates, Inc.
1018 Wilson Boulevard
Arlington, Virginia 22209

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Executive Summary

The need for expanded and improved vocational education services to Indian people has been expressed by many groups ranging from Indian tribes themselves, to the National Advisory Council on Vocational Education, to the United States House of Representatives Committee on Education and Labor. This study examines the nature and scope of vocational education services provided to Navajo people both on and near the Navajo Reservation. The study has three major purposes:

- To develop a complete picture of vocational education programs offered by state and local education agencies, the Bureau of Indian Affairs, the Navajo Tribe, and other agencies and to determine whether vocational education funds are allocated in an equitable manner.

- To identify where critical decisions concerning vocational education programs are made so that the tribe can work to influence these decisions.

- To analyze existing vocational education services in terms of their relevance to job opportunities presently available on the reservation as well as those emerging through tribal natural resources and industrial development activities.

A study of vocational education on the Navajo reservation must begin with an understanding of the geographic, bureaucratic, and administrative realities of the Navajo Nation. With a population of nearly 150,000, the Navajo Nation is equivalent in land size to the state of West Virginia and is located in three states -- Arizona, New Mexico and Utah. Some Navajo students attend public schools in approximately eleven different school districts, both on and off the reservation. Other Navajo students attend and may board at Bureau of Indian Affairs schools; these schools are administered and funded by the federal government, and are autonomous from State Departments of Education and local school districts. Still other students attend mission school or contract schools operated by Indian organizations under contract from the Bureau of Indian Affairs. Finally, the socio-economic characteristics of the Navajo people reflect the starkest poverty in the United States. Per capita personal income is only $900 a year in contrast to $3,921 for the United States. Only 40% of the Navajo labor force is employed in contrast to 94% of the total United States labor force.

This study takes place at a time when there is a growing initiative to develop tribal institutions with the capacity to plan and manage programs that provide services to tribal members. The Indian Self-Determination and Education Assistance Act of 1975 affirmed this policy. Therefore, it is a basic premise of this study that the Navajo Tribe has the inherent right to plan and manage programs responding to the needs of its people. It follows from this premise that federal and state governments must recognize this right in their policies and programs, and respond with the technical and financial resources necessary to build the capacity of tribal institutions and offer relevant services.

The Navajo Division of Education is the designated tribal agency in the field of vocational education. This study was sponsored by the Division in order to provide the Navajo Tribe and its Division of Education with the information necessary to develop an approach to vocational education and to sensitize federal and state officials to the unique nature of the vocational education problems on the reservation.

A. Federal and State Funding of Vocational Education (See pp. II-1 - II-9.)

The federal government, through the Vocational Education Act of 1963 as amended, P.L. 90-576, provides financing for vocational education programs at the secondary, postsecondary, and adult levels; these programs should be as available to the Navajo people as to any other group of citizens. Part B of the Vocational Education Act is the most significant since almost 80% of all federal dollars allocated to the states for vocational education are available through Part B. Under Part B, the federal government provides formula grants to the states based on the number of people in various age groups, adjusted according to the per capita income of the states. Of these funds, 15% must be set aside for disadvantaged students and 10% for handicapped students; these set asides are to be distributed to local school districts within the states based on the presence of disadvantaged and handicapped people in the population. An additional set aside of 15% must be made for postsecondary education, but many states spend much more than the 15% at the postsecondary level. One would expect a significant portion of disadvantaged and handicapped funds to be allocated to the Navajo school districts given the number of disadvantaged and handicapped persons. Such is not the case, however, as is indicated by a close examination of the allocation of vocational education funds in Arizona and New Mexico. Overall the analysis reveals a substantial underfunding of the reservation school districts.

Federal regulations require that the states distribute the Part B entitlement funds according to four criteria:

- Current and projected manpower needs and job opportunities;
- Vocational education needs of different segments of the population;
- Relative ability of local education agencies to meet local needs with local tax revenues;
- Relative cost of programs and activities to the local education agency, taking into consideration that certain local education agencies are likely to have higher costs because of the need for bilingual education or extensive busing.

No LEA which is making a reasonable tax effort is to be denied funds because it is unable to pay the nonfederal share for the cost of a vocational program.

The states are required to consider these criteria in developing their allocation formula for distributing vocational funds to LEA's. One would expect the entitlement allocation formula to work in favor of those school districts located on and near the reservation given the problems of public school financing in those districts - and the socio-economic status of the Navajo Tribe. Again, close examination of the allocation formulas reveals that several factors utilized do not recognize the real needs of the reservation school districts and work severely and unfavorably against them. We are not alone in our criticism of the state allocation systems. BOAE reviews have reached similar conclusions in both states.

1. Arizona (See pp. III-1 - III-36.)

a. Entitlement Formula

Arizona determines the amount of entitlement funds that will go to individual local school districts by first determining the amount for each county in the state, then determining the amount for each school district within the county. The amount that will go to each county is the sum of a factor based on need and a factor based on effort. The most unusual phenomenon in the Arizona formula is that the counties serving the reservation receive more funds based on effort than the amount they receive based on need. It is ironic that counties in which the school districts are facing major financial crises are receiving more for effort than for need.

Six criteria are used to determine the county need factor:

- Total population -- last complete fiscal year.
- Families with less than $3,000 a year income.
- Unemployed persons fourteen years of age and over.
- Number of persons employed.
- Persons fourteen to seventeen years of age not enrolled in school.
- High school enrollment -- last complete fiscal year.

An analysis reveals that several of these factors and much of the data utilized work against counties and school districts serving large Indian populations. For example:

Population: Utilizing total population instead of the 15-19 year old population as in the federal formula reduces the amount received by a county with an unusually large number of children in their population such as Navajo. Furthermore, it is contradictory to utilize total population figures in a formula designed to allocate funds to secondary school vocational programs where students are generally 15 to 19 years old.

Unemployed Persons: Utilizing Employment Security unemployment data works severely against rural counties with large numbers of Indians due to their exceptionally low labor force participation rate. Because Indians are not trained for many of the jobs existing on the reservation, the labor force participation rate for Navajo men and women is 47% and 22% respectively compared to 74% and 39% for the state. The reported unemployment rate of 7.3% in Apache County, 5.9% in Coconino and 6.5% in Navajo is a percentage of the seriously deflated labor force participation rate and in no way reflects the number of unemployed on the reservation. Data available from the Navajo Office of Employment and Training Administration indicate a reservation unemployment rate of between 41% and 64% depending on the definition of unemployment.

Numbers of Persons Employed: Utilizing the number of employed persons in no way reflects the number who need vocational education. Surely a student should not be penalized because there are few jobs in a particular county; in fact, the opposite should be true.

Persons 14-17 Years Out of School: Data used for these factors simply do not reflect the true nature of the drop-out problem on the reservation.

Total School Enrollment: Using total enrollment as a factor permits a school district which places greater emphasis on academic education than on vocational education to be considered to have the same need for vocational education as school districts which place a greater emphasis on vocational education than on academic education. Vocational education enrollment is a more viable factor.

Total public school enrollment as a factor does not recognize the Navajo students enrolled in BIA schools; the state receives federal funds for these students and is required to provide them with the opportunity for vocational training. A more equitable factor would be one that is based on vocational enrollment plus the percentage of BIA students who would be likely to enroll in vocational education programs were they available.

In summary, a more equitable method to determine need would utilize a 15-19 year old population (a) instead of total population; families with income under $3,000 (b); revised unemployment data to reflect the true labor force participation (c); revised 14-17 year olds not in school data that more accurately reflect the dropout rate (d); and vocational enrollment plus a percentage of BIA students in place of total enrollment (e). Each factor would be calculated as a percent of the state total for that factor. A county need allocation would then be determined by averaging the five factors:

$$\frac{a + b + c + d + e}{5} = \text{Need factor}$$

Three criteria are presently used to determine the effort factor:

- Vocational Enrollment
- Vocational Expenditures
- Average Tax Rate

Vocational Enrollment and Expenditures: These factors are to a degree inter-related, i.e., inadequate vocational expenditures limit vocational enrollment

The vocational expenditure criterion works against the reservation school districts because of the very limited tax base on which they operate because of non-taxable reservation land. If the Impact Aid (P.L. 874) funds which are in lieu of taxes were considered by the state of Arizona to be in fact in lieu of taxes the reservation school districts would receive substantially more state money than they do now. This would in turn be reflected in the district's total expenditures. This factor should remain in the formula, but Arizona must move toward a more equitable system of financing public education by recognizing Impact Aid funds for what they are intended to be. The Average Tax Rate, on the other hand, is an appropriate criterion and should remain in the formula.

A more equitable method of determining effort would utilize vocational expenditures (a) and average tax rate (b):

$$\frac{a + b}{2} = \text{Effort factor}$$

Revising the method of allocating funds from the state to the county would result in an increase of funds totalling approximately $130,000 to the three counties serving the reservation. A modification of the method for allocating funds from the county to the school district should also be undertaken to assure proper consideration of needs.

b. Disadvantaged, Handicapped and New Programs Funding (See pp. III-24 - III-28.)

A review of the funding patterns for each of these programs reveals inequities in funding to school districts serving the Navajo reservation.

1) Disadvantaged: There are two categories of disadvantaged funds. Over a four year period (1972-1975) reservation school districts received 1.6% of the Part A (102b) Disadvantaged funds and over the five year period from 1972-1976, 2.4% of the 4a Disadvantaged funds; in 1975 and 1976 they received no 4a funds at all. In both cases the percent of funds received is substantially below the vocational enrollment of the reservation school districts as a percentage of the total state vocational enrollment (5%).

2) Handicapped: The reservation school districts have not received any handicapped funds for the last five years.

3) New Programs: This category is designed to give local school districts the necessary funds for the capital expenditures required to begin new programs. Over a four year period from 1973-1976, the reservation school districts received 6% of the New Program funds. Two-thirds of the state's investment came in 1976, however, and is represented by a large allocation to a new high school on the reservation.

One of the criteria upon which New Program funds are allocated is a school district's ability to pick up the entire cost of the program following the initial year of state funding. This task is extremely difficult for reservation school districts given their limited amount of entitlement funds and their very weak local tax base.

2. New Mexico (See pp. III-37 - III-45.)

a. Funding Patterns

Prior to the institution of the state equalization formula, vocational education programs in New Mexico were funded on a flat rate per course; therefore larger and wealthier school districts with more programs and more students received more benefits. This system was found to be in violation of the federal regulations by the General Accounting Office (GAO). Thus, the poorer school districts, many with large Indian enrollments, entered the state equalization period with a lag in federal and state vocational education funding.

With the implementation of the State Equalization Formula the state, in effect, has substituted the equalization formula for the federal vocational education criteria since it subtracts federal vocational education funds from the amount of state funds it provides to local school districts. In the long run the equalization formula can only work to the benefit of school districts with large numbers of Indian children. However, the poor districts that were previously underfunded must be brought up to par. Additionally, there is a serious question as to whether the federal government should allow a state to consider federal funds, which are allocated by law and regulations for a specific purpose, as though they were state funds, not constrained by federal law and regulations.

Discussions have begun in New Mexico within the State Department of Education to remove the federal vocational monies from the equalization process. It has been suggested that a portion of the vocational funds be allocated to postsecondary programs, and a portion for capital outlays to purchase equipment for new courses at the secondary level. This allocation method would achieve the stated federal policy objective by assuring that funds are available to poor school districts to permit them to change programs according to their labor market demands. It is an acceptable alternative to the present method so long as provisions are included to make up for the past inequities by allocating vocational funds on a priority basis to school districts which were underfunded prior to equalization.

b. Disadvantaged and Handicapped Funds (See pp. III-42 - III-43.)

New Mexico does not now, nor has it in the past, made any special provision to serve the disadvantaged population. It argues that all

of its population is disadvantaged. There are, in fact, significant differences across the state, and vocational education funds are required to be targeted at the most disadvantaged. As to the handicapped, these set-aside funds have not been appropriately allocated either; these funds have not been used for programs for the handicapped in public school settings but have been entirely allocated to state institutions. This in no way addresses the problem of the large number of handicapped Navajo children who are served by the Indian Health Service and not by state institutions.

3. Special Funds for Vocational Education (See pp. III-46 - III-52.)

The local school districts as well as the BIA high schools have available three special programs which potentially could be used to help finance vocational education: Parts A and B of Title IV of the Indian Education Act, Title I of the Elementary and Secondary Education Act, and Johnson O'Malley (JOM) Supplemental Funds. These programs provided over 12 million dollars to schools on or near the reservation in FY 1976. The regulations for these programs do not preclude the support of supplementary vocational education programs, yet almost none of these funds were spent on vocational education, although parents continue to maintain that vocational education is a top priority in the education of Indian children.

The reality is that local school districts want and need additional revenues to operate expanded and improved vocational education programs. There is a real limit on the amount of local revenue that can be generated by school districts serving the reservation. Where a school district is operating a vocational education program, and that program is inadequate to meet the vocational education needs of disadvantaged students, the use of Title I, Title IV or JOM funds to support special vocational education programs becomes a very legitimate use of these funds, and contributes significantly to improving the educational opportunities of Indian children. If the Parent Committees which are required for each of these programs, were informed of their option to use the funds for vocational education, changes could occur in the future.

B. Secondary School Vocational Education (See Chapter III.)

The outcome of state, local school district and BIA action (or inaction) at the secondary level is a fragmented, unresponsive and ill-designed vocational education program for Navajo students.

1. State Plans, Hearings, and State Advisory Councils on Vocational Education

The Vocational Education Act requires that each state prepare a State Vocational Education Plan in order to receive federal funds. This plan is primarily a procedural document and as such, defines how the state will make certain decisions, but not what those decisions will be. All program decisions are made outside of the forum of the State Plan. BOAE does not require that the Plan define service priorities among special population groups, nor the problems inherent in the delivery of services to such groups; there is also no requirement for states to publish the amount allocated to local school districts. Data presented in the Arizona and New Mexico State Plans provide no basis for analyzing the needs of particular sub-state regions and only one reference is made to Indian needs: the Arizona plan states the need to increase "field staff to service Northern Arizona Indian reservation high schools".

Two approaches are provided by the existing process to influence the State Plan: public hearings and the State Vocational Education Advisory Council. However, neither approach is adequate; hearings are required only once a year and poor notice of their occurrence is given. The State Advisory Council evaluates the overall plans and decisions for the state but does not evaluate need or services offered to particular ethnic groups within the state. Neither approach offers local communities or ethnic minorities an opportunity to voice their concerns with any assurance or likelihood that they will be heard.

2. Local Public School District Planning and Decision-Making

Planning at the local school district level in both Arizona and New Mexico is most significant because it is rarely done. In Arizona, the receipt of entitlement and special program funds requires that local school districts develop vocational education plans and project applications. No such plans existed. The reservation school districts have had difficulty developing good applications, and in many cases have simply given up submitting applications for certain discretionary grant programs because they have been turned down so often in the past.

Arizona has developed a County Coordinator system to assist school districts in preparing proposals, to serve as a liaison between the school districts and the state department, and to support their vocational education efforts. The County Coordinator spends half time as director of the state-funded career education program and half-time providing vocational education services. The Coordinator for Apache and Navajo counties is responsible for 11 school districts in these two extremely rural counties and as a consequence, the reservation school districts do not receive adequate services. A full-time Coordinator for the reservation is warranted who could address on a reservation-wide basis the

problems of improved planning, more effective proposal development, better program management, and recruitment of vocational educators--problems which all the reservation school districts face. The Coordinator should work out of the Navajo Division of Education which has a reservation focus, and be funded jointly by the state, the local school districts and NDOE.

In New Mexico the equalization formula results in a decision-making process which is almost totally locally controlled. Decisions about vocational education programs are made at the local level according to the priorities set by the local boards and/or the ability of the vocational education director in a school district to "sell" the program.

Although vocational education plans in New Mexico are supposed to be submitted to the state on an annual basis, they are actually submitted about every three years and they are not rigorously reviewed; at best, they are pro forma reports designed to provide documentation for the basis on which federal funds have been distributed. Thus, a system emerges in which there is little if any quality control and little monitoring or evaluation of local programs.

It comes as no surprise, therefore, that secondary vocational education in New Mexico has come under severe criticism from a special Governor's Task Force for being "ineffective in placing students in jobs for which they were trained or in raising their occupational levels compared to students who had not taken vocational education at the secondary level".

On the basis of the task force report evaluation, New Mexico has determined that vocational education at the secondary level has little value, and the major thrust in the state should be to emphasize postsecondary vocational education. The question of why vocational education at the secondary level has been so weak was never addressed.

3. BIA Secondary Schools (See pp. VI-1 - VI-10.)

Although vocational education policy in the Bureau of Indian Affairs has undergone significant change in the past 25 years, today it can best be characterized by a lack of policy. There is no organizational or administrative unit that has responsibility for vocational education. There is no education specialist in the Central Office, the Indian Education Resource Center or in the Area Office who is responsible for vocational education. To the extent that a BIA high school is interested in providing a vocational education course or program, it is left to its own devices to do so. There are no funds earmarked for vocational education. If such a program is to be established, it must utilize regular education funds. No consideration is given to the high cost of vocational education programs or the absence of special funds. It is, therefore, not surprising that the limited courses offered at BIA high schools are considered "pre-vocational" only.

The failure to have an on-going vocational program with appropriate supporting offices and staff is perhaps one of the reasons that Bureau schools have never received funds through the Federal Vocational Act. All Indians living in the state, including those attending Bureau schools, are counted in determining the population base to be used in the federal formula for allocating money to the states. Yet none of these funds has ever gone to the Bureau schools. Only rarely have systems been developed to permit BIA students to participate in public school programs. The states recognize this situation, but argue that because local taxes do not support BIA schools, the state cannot legally provide federal vocational funds and stay within the federal regulations and criteria.

State officials do not see any obstacle to Bureau students participating in public school programs, if the schools involved can agree and work out the logistics of getting students from one school to another for classes. At the Tuba City high school, a joint BIA/public high school, Bureau students are in fact participating in vocational education programs supported by the state with federal and state vocational education funds. This was the only instance where this has occurred. Because of the lack of initiative on the part of the Bureau in pursuing federal vocational funds, or in assuring that its students participate in public vocational education programs, the majority of students in Bureau schools are left without the benefit of adequate vocational programs and have been deprived of services.

C. Postsecondary Vocational Education (See pp. IV-1 - IV-12.)

1. Public and Private Postsecondary Institutions

Five institutions offer postsecondary education on or near the reservation. Two of these institutions, Northland Pioneer in Arizona, and San Juan Campus NMSU in New Mexico are part of their respective state higher education systems. Navajo Community College, with campuses at Tsaile and Shiprock, is a tribally-chartered two year institution that offers vocational-technical and academic programs. The remaining two institutions--the University of New Mexico, Gallup Branch and the College of Ganado, a private church-related college--do not presently provide vocational training, but both are interested in developing such programs.

None of the institutions except the NCC has dormitory facilities and, therefore, the vocational programs that are provided are inaccessible to students who live too far to commute. Northland responds to this problem by offering courses at a variety of locations across the Arizona portion of the reservation as well as in several communities which are accessible to certain areas of the reservation. (However, the heavy emphasis of the reservation programs is Adult Basic Education and not vocational education.)

Northland and San Juan receive federal vocational education entitlement funds to support their vocational/technical programs and can compete for funds to support additional vocational programs. Both institutions are also supported by state and local taxes. The community college system in Arizona is particularly extensive, and very inexpensive for residents of the state. Navajos are eligible to attend not only Northland Pioneer but any of the other community colleges in the state if they wish to participate in a program not offered at Northland.

Nearly all of the vocational-technical programs offered at these institutions are relatively new and are somewhat limited. Officials at each institution indicated they are interested in expanding their programs if a minimum number of students are interested in a course and if job opportunities are available to graduates.

All indicated a desire to avoid the appearance of usurping the role of NCC in postsecondary vocational-technical education on the reservation. With the limited amount of postsecondary vocational education available on and near the reservation, however, there is certainly room for the existing institutions to expand in a way that enhances rather than detracts from the efforts of NCC. By taking full advantage of programs that have a guarantee of funds from sources not available to NCC, e.g., state and local taxes as well as federal vocational entitlement funds, the tribe incurs little expense and could expand the pool of available vocational education resources for its people.

NCC and NDOE should take the initiative to encourage the various institutions to provide programs and courses that complement each other and provide maximum training alternatives on the reservation. The higher education and advanced training programs of the tribe and the BIA should be encouraged to utilize these institutions on and near the reservation in an effort to build and support viable training programs close to the reservation. To the extent that institutions are utilized that are closer to the reservation and less expensive, funds are freed to assist a larger number of students to obtain training.

2. BIA Postsecondary Vocational Education (See pp. VI-11 - VI-18.)

The BIA operates two major postsecondary institutions which offer substantial vocational/technical programs: the Southwestern Indian Polytechnic Institute and Haskell Indian Junior College.

Each of the institutions functions independently with little knowledge or information about the other's programs and activities. It appears that they may, in fact, compete for the same students in that their funding levels to some extent are based on the number of students enrolled.

Both institutions offer training in a variety of occupational areas. Navajo students from each of the five agencies attend both institutions, comprising 34% of the enrollment at SIPI and 8% of the enrollment at Haskell.

The total enrollment at SIPI at the time this study was conducted represented only 54% of the SIPI enrollment capacity. Even the peak enrollment periods in October and February reflected an under-utilization of between 33% and 40%. A variety of reasons was given for this underenrollment, none of which could be substantiated. Such a situation is troublesome in light of the fact that the BIA's Adult Vocational Training program complains of a backlog of applicants whom they cannot serve. Utilizing the training opportunities at SIPI rather than other, often expensive, proprietary institutions, would free up more training dollars because AVT does not have to pay tuition costs for students who attend SIPI. More in-depth research is required to determine the reasons for the under-utilization of the facilities at SIPI and what can be done to correct the situation.

Neither SIPI nor Haskell keeps adequate follow-up and placement data that would permit an evaluation or analysis of their programs. It is difficult to understand why the BIA does not require some kind of uniform, comprehensive data system for evaluation purposes; the lack of information is particularly hard to comprehend when one considers that over three million dollars a year is invested in SIPI alone. It would have been of value to this study to be able to determine whether students trained at these institutions found employment in the field in which they were trained, whether they obtained employment on or near their reservation or home, or whether they accepted employment in urban areas.

The problem in BIA postsecondary schools is not dissimilar to that of BIA secondary schools: an absence of established policy, inadequate planning, and little program control.

D. BIA Adult Vocational Training Program (AVT) (See pp. VI-19 - VI-26.)

The AVT program began in the late 1950's for the purpose of relocating and assimilating reservation Indians (18-35 years of age) by moving them from their homes to urban areas on the theory that since there were no employment opportunities on the reservations, Indians could obtain training and subsequently find employment in the cities. There is little evidence to support the hypothesis put forth by the AVT that the participants sent to urban areas for training would actually find employment and remain. It appears that most participants desire to return to the reservation. There is no indication in the AVT operating procedures or policy that much effort is exerted to train participants for existing employment opportunities on the reservation. To the extent that labor demand data for the reservation are utilized, the data are out-of-date and irrelevant. Officials argue that there are no employment opportunities on the reservation, but make such statements without examining those jobs now being held by non-Navajos which could be filled by Navajos if they were adequately trained. There is also no evidence that AVT attempts to coordinate with other training programs to insure that too many people are not being trained for certain occupations while other jobs go unfilled because not enough people are being trained.

Recently there has been a shift in the Bureau policy about how far from their homes people should be sent for training. Even with the supposed change in policy, little effort has been made to support the existing postsecondary training opportunities on and near the reservation.

Officials of the Navajo AVT program offer a variety of reasons to explain why the community college vocational training programs on and near the reservation are not utilized to a greater extent; however none can withstand scrutiny. Particularly ironic is the statement that community colleges do not cooperate with AVT in providing required follow-up reports on AVT enrollees. There is, however, no systematic reporting procedure within the Bureau to determine who, where, and for what, people are being trained through AVT--a major failing in a program that represents an investment of over three million dollars a year on the Navajo Reservation alone. Without such data, program effectiveness simply cannot be evaluated.

There are many ways in which the AVT program could assist in building a permanent vocational education infrastructure, with equipment, facilities and training opportunities on and near the reservation. Vocational education facilities at Bureau high schools could be used both in the evening and during the day by adults as well as high school students. Postsecondary institutions on and near the reservation have the capability and desire to develop more comprehensive vocational/technical programs; these institutions are far more responsive to existing training needs on and near the reservation, the demands of industrial and natural resources development on the reservation, and the tribe's priorities, than are proprietary vocational schools in Denver, Salt Lake City and elsewhere.

The AVT funds represent one of the most important resources for vocational education on or near the Navajo Reservation. These resources have not been used to produce maximum benefits to the individuals or the tribe in the past. Provisions of the Indian Self-Determination Act give the Navajo Tribe the legal authority to insist that the AVT program improve its operations, whether the tribe advocates a redesign of the program to reflect tribal priorities, or whether it contracts for the administration and operation of the program. The tribe, using the Self-Determination Act or other approaches, must clarify its own policy and operating procedures, and link AVT into a comprehensive vocational education training policy suitable to the needs of the Navajo Tribe.

Until the BIA focuses attention at a national level on the problems and issues of vocational education at the secondary and postsecondary level in the BIA, there is little hope for significant change. Such attention must be demanded not only by the Navajo Tribe, but by all other tribes with a concern for the opportunities of their children to secure meaningful vocational training.

E. Navajo Office of Employment and Training Administration (NOETA)

Through funds it receives under various titles of the Comprehensive Employment and Training Act (CETA), NOETA provides skill training in a range of different occupational categories. Presently, Navajo Community College (NCC) is responsible for the Farm Training aspect for NOETA; an expansion of NCC's role in providing training is being negotiated.

NOETA's capability will be greatly enhanced upon completion of the Skills Center in Crownpoint, N.M.; this facility will have the capacity to train 250 Navajos primarily to assure jobs in the construction industry.

NOETA presently assists in the support of a vocational education program at the BIA's Ft. Wingate High School; the program utilizes a cooperative vocational education approach in which students receiving training in the housing construction trades perform actual construction work under supervision after school. This approach, utilizing a coordinated effort between schools and training resources, should be expanded.

Employment and training funds are an essential component of the education and training resources available on the reservation, and should be more effectively integrated with secondary and postsecondary vocational education programs.

F. Vocational Education Courses and Enrollment as it Relates to Labor Market Needs (See Chapter VII)

In order to determine the adequacy of the existing vocational education programs on and near the reservation, vocational courses designed for the acquisition of employment skills were examined in relation to available employment opportunities. Since Indians comprise approximately 35% of the total population in the counties on and near the reservation and close to 100% of the population on the reservation itself, these percentages are considered a fair benchmark to determine whether Navajos are properly represented in particular segments of the labor market. When examining Navajo employment on and near the reservation, it is important to keep in mind the issue of Indian preference in hiring. The Office of Navajo Labor Relations has been exercising its legal authority to require employers on the reservation to give Indians such preference. In addition, the BIA and IHS are also required by law to give preference to Indians in their hiring. The Department of Labor has proposed regulations allowing employers near the reservation to offer preference to Indians without violating equal employment requirements. These provisions make the analysis of the presence of non-Indians in jobs on and near the reservation a critical factor in evaluating job opportunities for Indians.

1970 Census data for the counties on and near the reservation indicate that only 23% of those employed are Indian; only in the health service and carpentry occupations do Indians represent more than 35% of those employed. A Business/Service Industries Survey on the reservation conducted by the tribe shows that Navajos comprise only 62% of the labor force on the reservation. Both sources show that Indian employment is highest in those occupations requiring least training--occupations which are also among the lowest paying.

An examination of secondary and postsecondary vocational courses on and near the reservation shows that very few courses are offered in distributive and health education. Given the fact that only 3% of those employed in retail trades and less than 1% in the medical and health technician occupations are Indians, an expansion of courses in these occupations is warranted, and Navajo students should be encouraged to participate. Technical courses, generally offered at the postsecondary level only, are extremely limited; unless technical training opportunities are expanded, the better paying technical jobs, 86% of which are now being held by non-Indians, will continue to be filled by non-Indians.

At the secondary level, Indians are most heavily enrolled in agriculture courses. Every school district offers agriculture courses, but few are in agricultural mechanics or in agricultural production, the occupations most likely to be in demand, if the vast expansion of agricultural employment anticipated as a result of the Navajo Indian Irrigation Project occurs. Agricultural employment presently accounts for only 1% of the total employment on and near the reservation, and Indians comprise 29% of those employed. Although data differ on future projections of agricultural employment needs, none seem to justify the plethora of agriculture courses presently being offered.

For those who argue that there are no jobs on the reservation, one need only look at the employment of craftsmen: 70% of the craftsmen on and near the reservation and 41% of the craftsmen on the reservation itself are not Indians. Data indicate that there is a demand for construction craftsmen, mechanics and repairmen in all job classifications except auto mechanics, the one course which is offered in almost every school district. More and varied trade and industrial education courses are needed if Navajos are to take advantage of the opportunities for skilled employment.

Using available data, a detailed review of the relevance of course offerings to present and future labor market needs must be undertaken, giving special attention to jobs now held by non-Indians which Navajos can fill when adequately trained. Navajo enrollemnt in courses which train people for demand occupations should also be examined. Coincident

with this review, must come the development of up to date and accurate labor market information to insure that course development will realistically reflect the employment situation.

G. Federal Involvement in Provision of Vocational Education Services to Indians (See Chapter VIII)

The federal government has not acted effectively to assure that the needs of Indians are properly considered in the delivery of vocational education services by states and local school districts. Little action has been taken against the states to require a more equitable distribution of funds. Although a review of the Arizona entitlement formula by the Bureau of Occupational and Adult Education stated that the formula needed improvement to make it more reflective of federal regulations, BOAE did not provide any specific recommendations, nor require the state to revise the formula. In New Mexico the legality of the method for distributing funds is in question by GAO, yet the federal government has taken no action to change it. Nor has the federal government investigated in sufficient depth whether disadvantaged and handicapped set-aside funds have been targeted at the populations for which they are intended by law.

It is quite clear that BOAE views vocational education as a state program with the primary responsibility for vocational education programs resting with the states. The federal role is viewed as secondary since the states contribute about $6 to every $1 of federal money. As a result, BOAE has done only limited monitoring of state actions and has imposed little in the way of special conditions or sanctions. In the extreme, what this means is that states can fail to meet federal standards with little fear that federal sanctions will ensue. Such a narrow federal role is particularly serious for "vulnerable" populations such as Indians whose rights are not likely to be recognized absent a strong federal presence. BOAE takes this position in the face of legislative intent which clearly is to protect these vulnerable populations.

In our view the federal government must act to remedy the inequities. It is not a question of how much federal money is involved; the issue is whether laws and regulations have been followed in both their letter and spirit.

The federal government's role will be even more important for Indian vocational education in the future with the implementation of the Indian vocational education program established in the new vocational education legislation. The provision authorizes the Commissioner of Education to enter into contracts with any Indian tribe or tribal organization, if the

tribe or tribal organization has contracted to administer any program under the Indian Self-Determination Act. The program contracted under the Self-Determination Act need not be an educational program. Approximately five million dollars will be available for such contracts, depending on the appropriation.

This provision permits tribes a great deal of flexibility in determining the nature, scope and design of vocational education programs. Possible activities include the planning, development and the operation of vocational education programs at the secondary, postsecondary, and adult level. The manner in which the program is designed and implemented by BOAE will be critical to future developments in Indian vocational education.

The new legislative provision does not, however, change the rights of Indian children to receive their fair share of vocational education funds which are allocated directly to the states. Care must be taken by federal officials to assure that states do not view this set-aside provision as justification for diminishing their contribution to vocational education for Indian students. Specific regulations must be developed to safeguard the rights of Indian people in this regard.

H. Summary and Recommendations (see Chapter IX)

1. Summary

Our analysis has shown that vocational education system serving the Navajo people fails to meet their needs. In reality, there is no vocational education system on the reservation.

The secondary level programs can be characterized in the following ways:

- The programs are inadequately financed.
- There is no coordination among local education agencies nor between the LEAs and the BIA.
- Course offerings are not appropriately responding to labor market demands.
- Inadequate resources are devoted to vocational education planning.
- There is very little technical assistance available to local vocational educators who seek to improve their programs.
- There is an insufficient emphasis in the secondary schools on training for employment.

Many of the same problems also exist at the postsecondary level. In addition, there are some special problems:

- There is little or no flexibility to deal with the problems created by the impact of state boundaries on programs and services available to reservation citizens.

- The role of the postsecondary institutions near the reservation is somewhat unclear and hesitant because of the lack of clarity with regard to the role and mission of NCC.

- The Bureau's AVT program has precipitated a draining from the reservation of both the skilled labor force and the resources and funds that could have been used to build and support a permanent vocational training capacity on or near the reservation.

- AVT has not adequately utilized vocational education opportunities at community colleges on and near the reservation or the Bureau's Southwestern Indian Polytechnic Institute in Albuquerque.

- The Bureau lacks a coherent policy and program of postsecondary vocational education.

2. Recommendations to Navajo Division of Education

Efforts to begin improving vocational education should focus on the secondary level with the development of Vocational Education Networks designed to serve defined geographic areas. The vocational education courses offered at any of the schools that make up the **Network** would be available to students whether they are attending public, BIA, contract or mission schools. The Navajo Division of Education should take the initiative for gaining the cooperation of these schools. The incentive which NDOE has to secure participation of the schools are the special funds for vocational education available only to the tribe (e.g., Indian set-aside in Vocational Education Act, CETA funds, etc.). NDOE should have administrative/management responsibility and assure that a transportation system is in place so that students can get to classes. Courses should be planned according to the labor demends and student interest in the geographic area, not at an individual school, and the location of new courses would depend on available facilities and equipment. It is envisioned that a centrally located school would serve as the administrative center and provide the major training resource, with satellite centers located at the various schools within the **Network** area. The **Network** concept can lend a coherence to secondary level vocational education which presently does not exist.

While the Vocational Education Network is being designed and implemented at one site, the following recommendations should be pursued as NDOE's resources and technical staff capability are developed:

NDOE should develop a Vocational Technical Education staff unit with technical expertise to work with schools, agencies, institutions and State Departments of Vocational Education. Responsibilities of such a unit would include:

- Developing a Vocational Education and Training Plan for the Navajo Tribe that describes training needs and working with the Navajo Office of Employment and Training to implement the Plan.

- Becoming involved in the development of the regulations on the Indian set-aside provision in the new vocational education legislation which expands the tribal role in vocational education. When the funds become available, NDOE should move promptly to contract for a program to assist in the design of the Vocational Education Network.

- Working with State Departments of Vocational Education in any way necessary to insure that the interests of the Navajo people are represented in important decisions, particularly those having to do with allocation of funds.

- Working with local school districts to review courses, identify training needs, develop plans and applications for funds.

- Working with the BIA in a manner consistent with the Network concept to encourage expansion of vocational education programs that are complementary not duplicative of existing programs, and to insure participation of Bureau students in existing public school programs.

3. Recommendations to Other Agencies and Institutions

In addition to cooperating with NDOE on the implementation of the recommendations noted above, other agencies should simultaneously follow through on the specific recommendations highlighted below:

Navajo Community College

- Develop the planning capability necessary to define its role and goals in implementing the Vocational Education and Training Plan.

- Assume a leadership role in working with other postsecondary institutions to insure maximum utilization of existing programs and resources.

Bureau of Indian Affairs

- Establish a vocational education division and define, in cooperation with the tribe, a vocational education policy.
- Establish a separate budget line item to support vocational education programs.
- Insure that secondary students have access to public school vocational education programs and provide transportation so that this can realistically happen.
- Encourage full utilization and cooperation of postsecondary institutions, utilize relevant labor demand information that accurately reflects the situation on Navajo, and establish a follow-up and monitoring system that permits evaluation to occur.
- By utilizing Adult Vocational Training Program funds, implement a policy of utilizing training opportunities on and near the reservation; support vocational training at community colleges, particularly those on and near the reservation.

Arizona and New Mexico

- Recognize tribal priorities for secondary vocational education as a basis for their own planning and decision-making; funds should be focused on vocational training leading to employment rather than financing career awareness programs.
- Develop a more equitable allocation method of entitlement, disadvantaged, and handicapped funds.
- Insure that BIA students have access to public school vocational education programs.
- Require and assist in comprehensive vocational education planning at the local level.
- Include in State Plans the amount of funds that have been allocated to local school districts under the various funding categories.

- Monitor and evaluate local programs to assure that students in the programs receive full value for the state and federal funds so invested.

Bureau of Occupational and Adult Education

- Provide specific recommendations to states as to how their formulas should be modified, and work with the states to insure that revisions occur.

- Monitor the allocation of all funds but particularly disadvantaged and handicapped funds to see that they are allocated equitably and in accordance with the law and regulations.

Special Recommendations to BOAE on the Indian Vocational Education Program

- Create a special office for the management of the Indian set-aside with responsibility for monitoring the actions of state vocational education departments to assure their accountability to the needs of Indian people.

- Insure that the new legislation does not in any way diminish the obligation of the states to provide vocational education funds to Indians to which they are entitled under the general provisions of the law.

- Coordinate with the BIA to develop a rational federal vocational education policy for Indian tribes.

- Make special efforts to inform Indian tribes of the opportunities available under the new legislation.

- Develop technical assistance programs for any tribe interested in planning, conducting or evaluating vocational education programs.

- Place a priority for project funding on efforts by tribes to coordinate the resources of BIA and public schools into a comprehensive vocational education system.

- Fund Indian programs for at least a three year period to enable tribes to develop their capabilities and to give them a opportunity to leverage and impact other vocational education agencies.

I. Introduction

In 1973, the National Advisory Council on Vocational Education in its Special Report on Indian Education described the condition of vocational education services to Indians:

> Indian vocational education needs improvement. Secondary level vocational programs (for Indians) must be drastically increased.

By 1976 there had been no improvement. The U.S. House of Representatives' Committee on Education and Labor found that the same problems exist in 1976:

> State boards of vocational education are failing miserably in meeting the needs of Indian citizens for vocational education. It seems that State vocational education administrators do not feel any responsibility for Indians since there is a Bureau of Indian Affairs created to operate programs for Indians.

The Committee also cites the Bureau of Indian Affairs for its "present policy of not funding vocational education programs with its own funds."

To those experienced in Indian affairs this situation is sadly all too familiar. The state says it is the Bureau's responsibility; yet the BIA is not providing service to students in BIA schools and cannot provide service to students in the public schools. While the bureaucrats argue, or even worse, ignore the situation, Indian people are not receiving services and suffer the economic and social consequences.

The need and desire for vocational education services near their homes has been most eloquently expressed by the Navajo people at Hearings held by the Navajo Division of Education across the entire Navajo reservation:

> .....We need a local school where these students cannot only attend school and take academic courses, but which also give them the opportunity to take vocational training. Those who....take vocational courses can still be near home where tools, equipment and employment can be developed.
>
> Employment assistance programs have failed to relocate Navajos in gainful occupations....Trainees have returned to their family home land....[without the skills necessary] to fill the vast labor pool needed to develop our nation.
>
> There are other students who have gone to high school, but for some reason--either lack of funds or poor academic achievement--they drop out. For those students, we would like to have a vocational training school. This means that these students will have the opportunity to learn a trade or vocation which will prepare them to seek employment.

The Hearings are also replete with a desire to have community college vocational and technical programs available at the local community level.

In response to these concerns, as well as a recognition that vocational education services were not responding to the needs of the Navajo people and the Navajo Nation, the Navajo Division of Education (NDOE) chose to pursue this research effort. The research was intended as the begining of an NDOE and tribal effort to understand what was really happening in vocational education at the secondary and postsecondary levels on and near the reservation. The major goals of the research were:

- To develop a complete picture of the nature and scope of vocational education programs now being offered by state and local education agencies, the BIA, the tribe itself, and other agencies to Navajo tribal members both on and near the reservation, and to determine whether funds are being provided for services to the Navajo people in an equitable manner.

- To identify the places where critical decisions concerning vocational education programs are made so that the tribe, in a coordinated fashion, can work to influence these decisions.

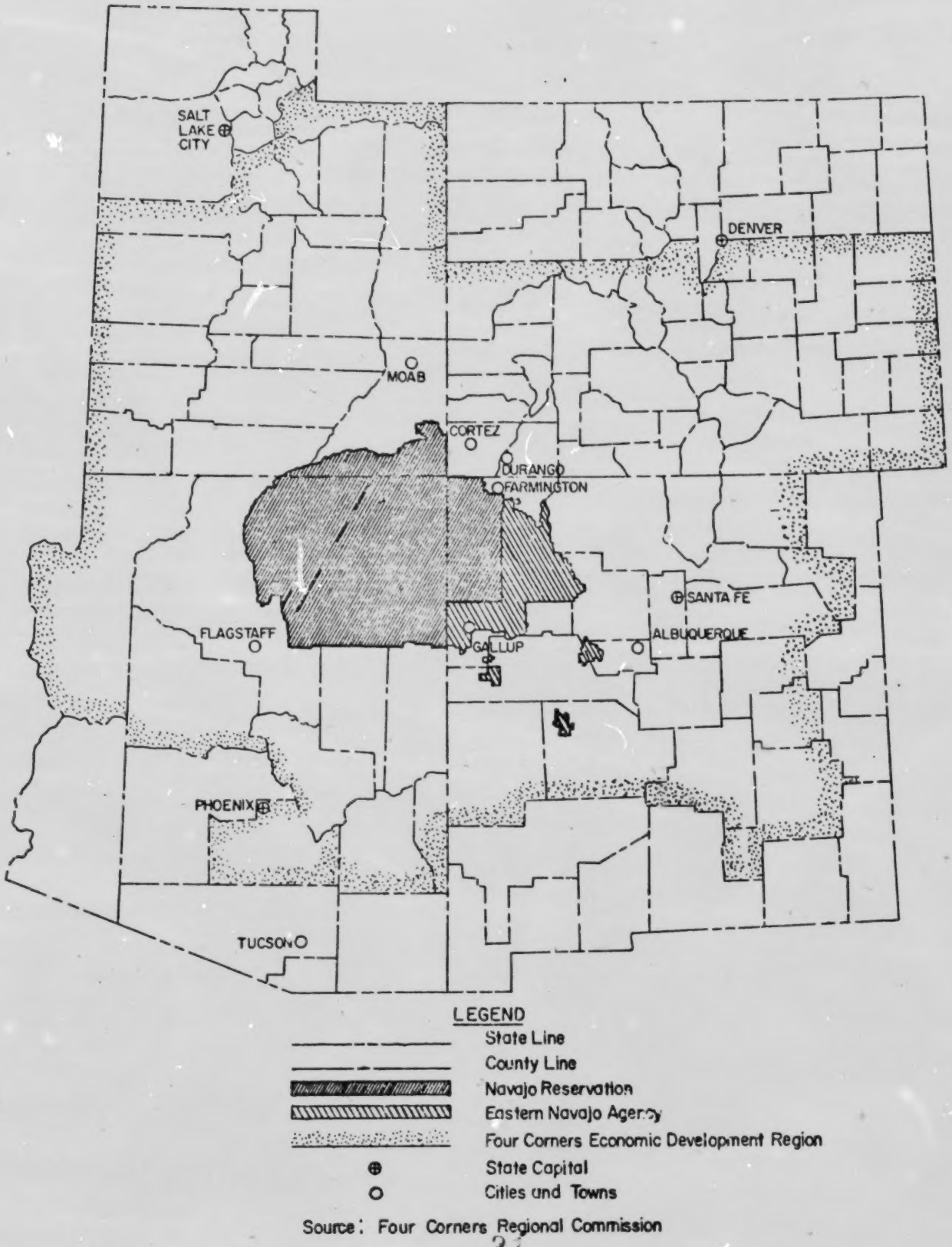
- To analyze existing vocational education services in terms of their relevance to job opportunities presently available on and near the reservation, as well as those emerging through tribal natural resources and industrial development activities.

This report responds to each of these goals. It is longer than we intended. In part, this is a reflection of the issue which is being considered; vocational education is complex. Funding procedures are complicated by policy and program decisions which must be made at the federal, state, and local levels. But the issue is further complicated by geographic, bureaucratic, and socioeconomic realities of the Navajo Nation.

With a population of nearly 150,000, the Navajo Nation is equivalent in size to the state of West Virginia and is located in three states--Arizona, New Mexico and Utah. (See Figure 1.) Navajo students attend public schools, both on the reservation and off, in approximately eleven different school districts. Other Navajo students attend, and often board, at Bureau or Indian Affairs schools which are administered and funded by the federal government and are autonomous from the State Departments of Education and from local school districts.

Figure 1

LOCATION OF THE NAVAJO NATION



Source: Four Corners Regional Commission

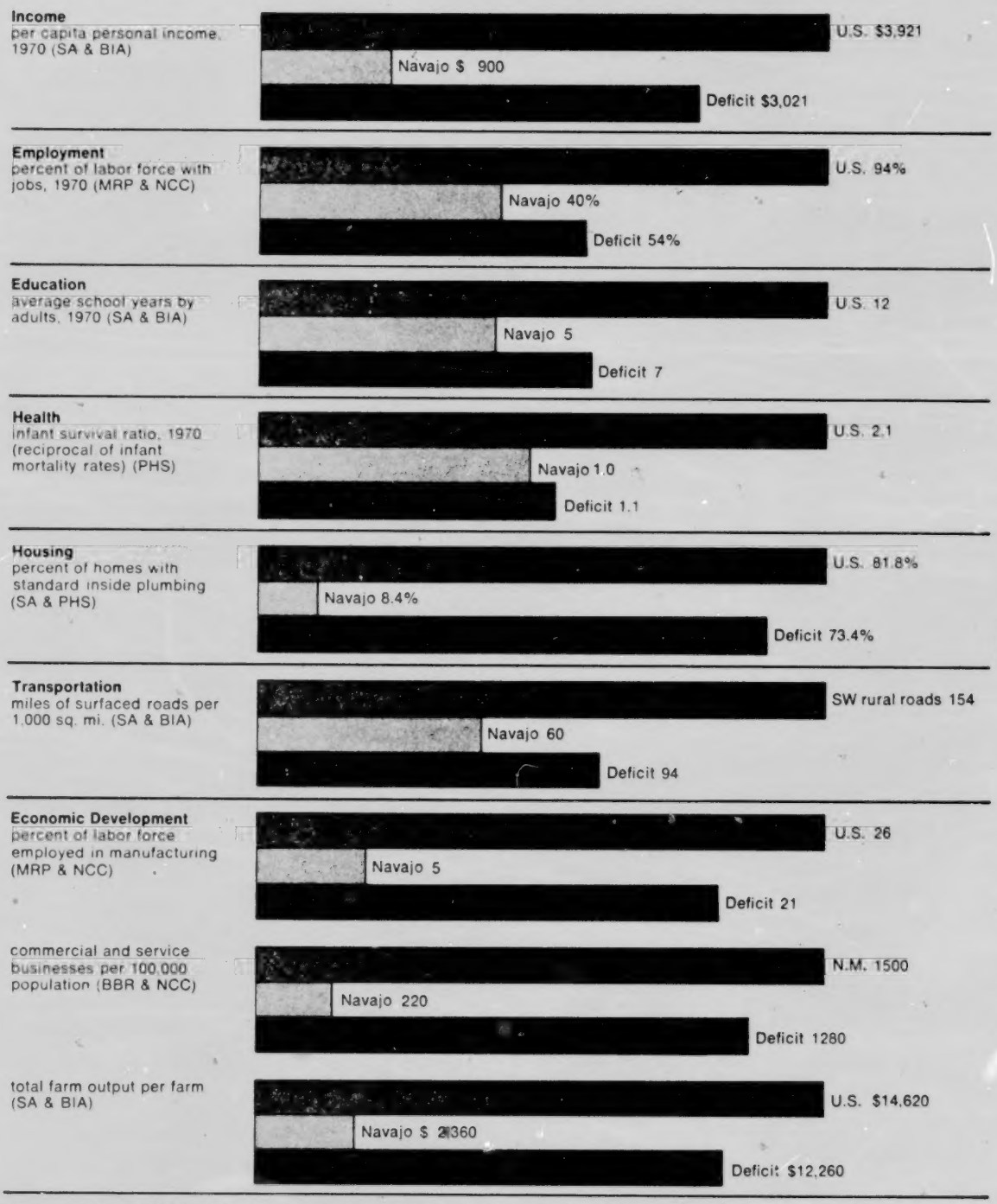
Vocational education for the Navajo people is more than just another need, though certainly the needs of the Navajo people are great. The average per capita personal income on the Navajo reservation is $900 compared to the U.S. figure of $3,921. Only 40% of the labor force have jobs, compared to 94% of the U.S. labor force. Whereas 26% of the U.S. labor force is employed in manufacturing, only 5% of the Navajo labor force is so employed. (See Figure 2.)

Given the enormous economic development potential on the Navajo reservations and the implications for an expanded labor force, vocational education becomes even more necessary. To reap the benefits of such economic development, i.e., for Navajos to secure the jobs that emerge, the tribe's human resources must be developed through programs such as vocational education. It follows logically, by virtue of the federal policies on self-determination, that the tribe is in the best position to determine the needs of its members and of the tribe as a whole. The findings of the U.S.Congress as stated in the Indian Self-Determination and Educational Assistance Act of 1975 are instructive here:

> Sec. 2. (a) The Congress after careful review of the Federal Government's historical and special legal relationship with, and resulting responsibilities to, American Indian people, finds that --
>
> (1) the prolonged Federal domination of Indian service programs has served to retard rather than enhance the progress of Indian people and their communities by depriving Indians of the full opportunity to develop leadership skills crucial to the realization of self-government, and has denied to the Indian people an effective voice in the planning and implementation of programs for the benefit of Indians which are responsive to the true needs of Indian communities: and
>
> (b) The Congress further finds that -
>
> (1) true self-determination in any society of people is dependent upon an educational process which will insure the development of qualified people to fulfill meaningful leadership roles:
>
> (2) the Federal responsibility for and assistance to education of Indian children has not effected the desired level of educational achievement or created the diverse opportunities and personal satisfaction which education can and should provide; and
>
> (3) parental and community control of the education process is of crucial importance to the Indian people
>
> DECLARATION OF POLICY
>
> Sec. 3. (a) The Congress hereby recognizes the obligation of the United States to respond to the strong expression of the Indian people for self-determination by assuring maximum Indian participation in the direction of educational as well as other Federal services to Indian communities so as to render such services more responsive to the needs and desires of those communities...
>
> (c) The Congress declares that a major national goal of the United

FIGURE 2

NAVAJO CATCH-UP REQUIREMENTS: SOCIAL INDICATORS



Sources for Figure 1: SA—Statistical Abstract of the United States, 1970; BIA—Navajo Area Office, Bureau of Indian Affairs; MRP—Manpower Report of the President, 1971; NCC—Navajo Community College; PHS—Navajo Area Office, Public Health Service; BBR—Bureau of Business Research, University of New Mexico.

Reprinted from the *Navajo Ten Year Plan*, Exhibit No. 11, pp. 500-01.

States is to provide the quantity and quality of educational services and opportunities which will permit Indian children to compete and excel in the life areas of their choice, and to achieve the measure of self-determination essential to their social and economic well-being. 1/

At the same time, the tribe would be the first to admit that it lacks the technical skills and resources to fully carry out the planning and coordinating of vocational education; vocational education and training are relatively new to the Navajo reservation. Planning is a highly technical and complex task under the best of conditions. In the shadow of generations of paternalistic policies fostered by both the federal and state governments, the Navajo Tribe has only recently begun to build governmental structures such as the Navajo Division of Education capable of carrying out the planning and programming necessary if programs are to be responsive to tribal needs. The federal and state governments have a moral and legal responsibility to provide the technical assistance necessary for the tribe to develop this capability. Neither is meeting their responsibility.

Good comprehensive planning on a coordinated basis is not only good for the Navajo Tribe and its people, it is good for the federal and state governments. Poor planning and programming are costly to the federal and state governments as well as to the tribe. When one considers the remedial measures which must be taken to compensate for the absence of effective programming, the long-range costs of piecemeal planning far exceed the costs of programs planned properly in the first place.

Additionally, the federal and state governments must dispel the prevalent attitude found in carrying out this research--that the Navajo "situation" is merely another problem to be contended with. Responsible officials must recognize that the tribe and its members have entitlements by virtue of legislative action and treaty and trust obligations. The special statue of the tribe and its citizens can no longer be ignored, nor can the entitlements and resources which are due the tribe continue to be circumvented.

The state and federal governments must adopt a more realistic view of the role of vocational education for the future of the Navajo Tribe. Rather than viewing the needs of the tribe as one more consideration among others to be incorporated into the needs of a particular planning district in the overall State Plan, the tribe and the reservation must be looked at as a unique entity. Unemployment rates of better than 40 percent do not reflect "standard" vocational education needs. They reflect a unique situation which requires a wholly different approach to planning and utilization of resources. Not only are the needs on the Navajo reservation greater, but the resources available are <u>different</u> and fewer. The tax base of the eleven public school districts is extremely narrow, causing chronic financial crises; there are vast distances between schools, and the road system is primitive; the Navajo language is the mother tongue for most Navajos; the job market to which training must be geared is vastly different. Any vocational education efforts must reflect the unique set of circumstances on the Navajo reservation.

1/ P.L. 93-638.

Any effort, however, to consider realistically implementing the recommendations made by this study, must take into account the fact that the Navajo Tribe does not have complete control or influence over all agencies and institutions who serve as deliverers of vocational education services to the Navajo people.

The diagram on the following page (Figure 3) outlines that myriad of agencies and the varying degrees of influence that the tribe has on the critical agencies.

The situation described above was part of the picture that emerged as extensive field interviews were conducted to gather data and information necessary for this report. Meetings were held at the tribal level with the Education Committee of the Navajo Tribal Council, with staff of the Navajo Division of Education, the Navajo Office of Employment and Training Administration, Navajo Community College, and the Tribal Office of Program Development. In addition, officials of state and local education agencies and public and private community colleges were interviewed. Bureau of Indian Affairs officials in the various agencies across the reservation, in the Area Office in Window Rock, in the Albuquerque Education Center and in Washington were interviewed. A meeting was also held with representatives of the Bureau of Occupational and Adult Education in Washington which is responsible for federal funding of vocational education programs to state and local education agencies. Data and information from all these interviews, as well as material provided by these agencies, have been analyzed to produce this report.

The structure of this report is as follows:

Chapter II describes the Federal Vocational Education Act of 1963 as amended and points out those parts of the Act which represent the major sources of funding for vocational education services. The chapter emphasizes the legislative requirements that certain funds be targeted on specific populations based on needs criteria, and that based on those criteria Navajos should be receiving a significant share of these funds.

Chapter III describes vocational education at the secondary level in Arizona and New Mexico. The systems utilized by each state for allocating vocational education funds to local school districts are critiqued in depth, to examine whether those districts serving Navajo youth have been receiving a fair share of funds. The relationships between the state the local school districts are examined as well as the planning and decision-making processes at the local school district level. Specific needs and problems faced by these districts are discussed. The final section of this chapter analyzes whether any of the special funds made available to school districts serving Indian children, (e.g., Title I, ESEA; Title IV, Indian Education Act, and Johnson O'Malley Act) are being used to support and supplement vocational education programs and services on the reservation. The legal authority for using these funds for vocational education is discussed.

Chapter IV describes vocational education funding and decision-making in the postsecondary institutions on or near the reservation. The institutions included are: Northland Pioneer Community College, College of Ganado in Arizona, San Juan Campus, and Gallup Branch in New Mexico, and Navajo Community College.

Figure 3

AGENCY	TYPE OF AGENCY	TRIBAL CONTROL/INFLUENCE
Navajo Division of Education; Navajo Office of Employment and Training	Tribal Department	Total control
Navajo Community College	Tribally Chartered Institution	Extensive influence and some control
Bureau of Indian Affairs (1) Secondary Schools (2) Adult Vocational Training Program	Agency which exists to meet tribal needs in accordance with principles of self-determination	Option to control by operating program under contract with the Bureau (Self-Determination Act, Regulation Part 271); or to require Bureau to operate program according to tribal plan (Part 272.27 of Self-Determination Regulations).
Local School Districts	Independent Public Agencies	Substantial influence given the Navajo student enrollment of the schools; tribal political power and influence to assist local districts.
Public Postsecondary Schools	Public Institution Under State Control	Moderate-to-limited influence as a function of the postsecondary institution's desire and willingness to meet needs and their views that the reservation is within their service area.
State Vocational Education Department	State Agencies Under Governor's Control	Limited influence; some option to exercise political pressure.
Bureau of Occupation and Adult Education, U.S. Office of Education	Federal Agency	Limited influence

The Employment and Training Programs of the Navajo Tribe, the Skills Center, soon to be constructed on the reservation, and the CETA Set-Aside funds for vocational education are described in Chapter V as they relate to other vocational education resources available to Navajo people. A linking of all training programs is suggested as the only way in which maximum benefit will be derived by the Navajo people.

Vocational education in the Bureau of Indian Affairs is discussed in Chapter VI. A close examination is given to the Bureau's lack of vocational education policy and programs at the secondary schools, at postsecondary institutions and in the Adult Vocational Training Program.

Chapter VII analyzes the relevance of the vocational education programs and courses provided by the secondary and postsecondary schools on and near the reservation as they relate to the labor market needs. Particular attention is given to the high employment of non-Navajos in the skilled occupations as areas where training should be emphasized.

Chapter VIII describes the role of the federal government in providing vocational education services to Indians. The provision regarding Indians that is included in the recently passed vocational education legislation is described in detail.

Chapter IX summarizes the key findings of the study in the context of the course of action which should be taken by the Navajo Tribe to improve the scope and quality of vocational education services on and near the reservation. Specific recommendations are made to each of the agencies (federal, state, local, and tribal) which play a key role in the vocational education scene.

A document which specifically analyzes the problems faced by the Navajo Tribe in dealing with states, eleven counties, innumerable school districts, and the BIA on vocational education issues can also serve as an indication of similar problems faced by all Indian tribes, albeit on a smaller scale. It can also provide a guide for Navajo, and other tribes as to the roles they might possibly play in applying the concept of Self-Determination to vocational education services.

Chapter II

I. Federal Financing of Vocational Education

The federal government, through the Vocational Education Act of 1963 as amended, P.L. 90-576, offers financing for vocational education programs at the secondary, postsecondary, and adult levels which should be serving the Navajo pople. 1/ The amount of federal funding for vocational education, when compared to the sums invested by state and local education agencies, is relatively small. However, the federal law and regulations do establish specific funding criteria and procedures which should be followed by the states if they are to qualify for federal vocational education funds. Therefore, an understanding of the federal legislation and its requirements is an essential first step in a review of vocational education services to the Navajo people.

The Vocational Education Act is divided into ten separate parts, nine of which are discussed here. Part B, State Vocational Education Programs, is the most significant since nearly 80% of all federal dollars are allocated to Part B. The other parts are less significant, and they have substantially fewer dollars available.

Table II-1

Federal Vocational Education Expenditures Under Part B, FY74, P.L. 90-576.

Total Fed Vocational Education Expenditures	Federal Expenditures Under Part B	% Part B
$468,196,893	$374,580,799	80%

Source: U.S. Dept. of Health, Education and Welfare, Office of Education, Bureau of Occupational and Adult Education. Vocational and Technical Education Selected Statistical Tables, Vocational Information No. III, Washington, D.C. Government Printing Office, 1974.

A. Part B of the Vocational Education Act: State Vocational Education Programs

Formula grants from the federal government are provided to states to assist them in conducting vocational education programs. Funds are allotted among the states on the basis of two factors: 1) The number of persons in the various age groups in the population needing vocational education 2/; 2) the per capita income in the states. Given the young

1/ This document was completed after the Vocational Education Act was amended in September of 1976. The report is based entirely on the old law; most of the issues discussed in this report will continue to be issues under the new legislation.

2/ 50% of the funds are allotted for 15 to 19 year olds; 20% for 20 to 24; and 15% for 25 to 65. P.L. 90-576, Sec. 103 (a). 5% is allotted on the basis of the sum of the other three; 10% is for OE and DOL.

age of the Indian population nationally and its very low per capita income, states with significant Indian populations, such as Arizona and New Mexico, receive proportionately more funds than other states due to the presence of a relatively substantial Indian population. States are required to match every federal dollar under Part B with one dollar of state and/or local funds. Fifteen percent of the federal Part B funds must be set aside for disadvantaged students, and 10% for the handicapped. A minimum of 15% of federal funds must be set aside for postsecondary education programs, although states may invest more than 15% in postsecondary vocational education if they choose. Funds may be used for construction of area vocational education facilities, but neither Arizona nor New Mexico has utilized funds for this purpose in the last several years.

Comprehensive plans describing specific policies and procedures for the distribution of vocational education funds must be developed in order for the states to qualify for federal funds, but federal regulations offer states a great deal of flexibility in defining their own policies and and procedures within the plan.

The regulations require that the states distribute funds under Part B of the Act to local education agencies according to four criteria: 1/

1. Current and projected manpower needs and job opportunities;

2. Vocational education needs of different segments of the population;

3. Relative ability of local education agencies to meet local needs with local tax revenues;

4. Relative cost of programs and activities to the local education agency, taking into consideration that certain local education agencies are likely to have higher costs because of the need for bilingual education or extensive busing.

The regulations also require that no local education agency which is making a reasonable tax effort can be "denied funds for establishing new vocational education programs solely because it is unable to pay the non-federal share of the cost of such programs." 2/ In addition, the 15% set-aside for disadvantaged students and the 10% set-aside for the handicapped must be distributed on the basis of the presence of disadvantaged and handicapped in the population.

These four criteria are to be considered by the states in distributing federal vocational education funds to local education agencies. Given these criteria it would be expected that the state distribution formula

1/ 45 CFR 102, Sec. 107.53 - 102.56.
2/ 45 CFR 102, Sec. 102.57.

would work in favor of the Navajo school districts because the reservation has 1) a tremendous need for skilled manpower; 2) a population which in all age groups needs vocational education; 3) a limited local tax base which makes local school financing a chronic problem, and; 4) a bicultural population making the costs of vocational education on the vast Navajo reservation necessarily greater. The detailed formulas applied in the states of Arizona and New Mexico are analyzed in Chapter III.

The disadvantaged and handicapped provisions of the legislation have been the subject of particular controversy not only in the states serving the Navajo Tribe, but also across the country. The regulatory requirements relative to these provisions are set forth here to provide a frame of reference for the in-depth discussion of the allocation of these funds in Chapter III. The regulations define handicapped persons as:

> persons who are mentally retarded, hard of hearing, deaf, speech impaired, visually handicapped, seriously emotionally disturbed, crippled, or other health impaired persons who by reason of their handicapping condition cannot succeed in a vocational or consumer and homemaking education program designed for persons without such handicaps and who for that reason require special educational assistance of a modified vocational or consumer and homemaking education program. 1/

Disadvantaged persons are defined by the Act as:

> persons who have academic, socio-economic, or other handicaps that prevent them from succeeding in vocational education or consumer and homemaking programs designed for persons without such handicaps, and who for that reason, require specially designed educational programs or related services. The term includes persons whose needs for such programs or services result from poverty, neglect, delinquency, or cultural or linquistic isolation from the community at large, but does not include physically or mentally handicapped persons (as defined in this section) unless such persons also suffer from the handicaps described in this paragraph.
>
> Vocational education programs for disadvantaged or handicapped persons, or persons of limited English-speaking ability shall include special educational programs and services designed to enable disadvantaged or handicapped persons, or person of limited English-speaking ability to achieve vocational education objectives that would otherwise be beyond their reach as a result of their handicapping condition. 2/

1/ 45 CFR 102, Sec. 102.3, Definitions

2/ 45 CFR 102, Sec. 102.3, Definitions

The regulations do not require that separate programs be established for disadvantaged and handicapped persons, but on the contrary, encourage the participation of these individuals in regular vocational education programs.

> To the extent feasible, disadvantaged or handicapped persons, or persons of limited English-speaking ability, shall be enrolled in vocational education programs designed for persons without their handicapping condition. Educational services required to enable them to benefit from such programs may take the form of modifications of such programs or of supplementary special educational services. 1/

> If certain disadvantaged or handicapped persons, or persons of limited English-speaking ability, cannot benefit from regular vocational education programs to any extent, . . . then these persons shall be provided with special programs of vocational instruction which meet the standards and requirements of all vocational education programs. 2/

Once again, given the high incidence of Navajo persons who fall into each of these categories, one would expect that a significant share of these special funds would be provided to the reservation school districts.

Besides the set-aside requirement in Part B, an additional appropriation of funds for disadvantaged persons is provided in Part A, Section 102 (b) of the vocational education legislation. Persons eligible under this provision of the legislation are:

> Persons (other than handicapped persons defined above) who have academic, socio-economic, or other handicaps that prevent them from succeeding in the regular vocational education program. 3/

> Funds (sic) appropriated under Section 102 (b) will be allocated within the State to vocational education programs for disadvantaged persons located in areas of the State with a high concentration of youth unemployment or school dropouts. 4/

The regulatory provisions concerning the vocational education services to be offered to persons eligible under this section are the same as for disadvantaged under Part B.

1/ 45 CFR 102, Sec. 103.6(c)
2/ op cit. (d)
3/ P.L. 90-576, Sec. 122 (a)
4/ 45 CFR 102.65

Approximately 22.4 million federal dollars were available nationally under Part A in FY 74; these are 100% federal funds. This amount accounted for only 1% of the total expenditures nationally (including state and local contributions). 1/ Since the Part A expenditures represent such an insignificant amount of the total vocational education funds, it becomes even more important that the 15% set-aside for the disadvantaged be targeted at the population for which it is intended.

B. The Implications of Federal Funding

Federal aid to the states in vocational education is intended as a catalyst to induce state and local education agencies to respond to national priorities. The intent in providing the federal funds is to encourage the states to assign a high priority to particular goals, such as establishing special programs for the disadvantaged and handicapped, by supplying financial aid that reduces the cost to the sponsoring agencies. However, the leverage effect of federal aid is frequently minimized for two reasons. First, the federal outlays are so overmatched by state/local expenditures that the federal dollars cannot have their desired effect; and second, there is an absence of explicit matching requirements for handicapped and disadvantaged set-asides; therefore, only the federal monies are necessarily targeted specifically for these groups. The state is free to allocate its funds according to state priorities. Since the federal outlays made up only 14% of the total national vocational education expenditures in 1974 (19% of the funds invested in Arizona, 28.5% in New Mexico, and 13.5% in Utah), 2/ the overall funding pattern very largely reflects the priorities of the state and local educational agencies, rather than federal priorities.

In this context, federal matching requirements become all but meaningless, since even one of the poorest states, New Mexico, nearly triples the federal funding with state and local expenditures. This heavy bulk of state/local funding prevails even in the poorer school districts serving the Navajo reservation, as is shown in Table 3 for selected Arizona school districts on or near the reservation.

In Arizona, in 1973-74, 21% of the funds allocated to school districts on the reservation came from the federal government, 9% from the state education agency and 70% from the local districts themselves. (See Table II-2.) The fact that federal funds represent a relatively small portion of the vocational education funds available in these states does not diminish the importance of these districts receiving their fair share of the federal dollars which are made available; in fact, given the limited amount of total dollars available, equitable distribution of federal monies becomes even more crucial.

1/ U.S. Dept. of Health, Education, and Welfare, Vocational and Technical Education Selected Statistical Table, Information No. III, 1975.

2/ U.S. Dept. of Health, Education, and Welfare, Vocational and Technical Education Selected Statistical Tables, Information No. III, 1974.

Table II-2

Federal and State/Local Funding of
Vocational Education in Selected School Districts,*
1974-75, Serving the Arizona Portion of the Navajo Reservation

Source of Funds	Amount	Percent
Local	$499,457	70%
State	$ 62,743	9%
Federal	$147,637	21%
Total	$709,837	100%

*School Districts include: Chinley, Ganado, Holbrook, Monument Valley, Page, Tuba City, Valley Union, Window Rock, Winslow.

Source: Arizona Department of Career and Vocational Education.

The Fair Share concept says that the different racial/ethnic minority groups who are among the primary intended recipients of HEW services ought to receive a share of the funds allocated to a specific program, in proportion to their presence in the "population of risk" (eligible population) for the program. A determination of Fair Share on the basis of incidence in the population alone is simply not valid. It is not correct to say that Indians should receive 0.4% of all Family Planning funds simply because that is the rate of their presence in the entire population. One must look further to determine exactly what the eligibility requirements for the program are, then define a methodology to determine the universe of eligible persons, and then determine the eligible persons from each ethnic minority, based on available data. The rate of a given ethnic minority's presence in the eligible population for that program is its Fair Share of the program's resource. Clearly, allocation of funds on the basis of the percent of a given group in the total population is inadequate if the funds are allocated for the use of children in poverty. Obviously, if the group has more children and more poverty, they would be entitled to a larger proportion of the funds available. 1/

C. Other Parts of the Vocational Education Act

There are seven other parts of the Vocational Education Act which are relevant to the Navajo; Table II-3 presents data indicating the amount of funds available for these parts in Arizona and New Mexico. This study does not include a detailed analysis of the funding patterns for these parts of the legislation.

1/ U.S. Department of Health, Education, and Welfare, Office of Special Concerns. A Study of Selected Socio-Economic Characteristics of Ethnic Minorities Based on the 1970 Census, Washington, D.C., DHEW, August 1974.

1. Part C. Research and Training

Part C funds are authorized for research, training programs for educators, developmental programs to meet special vocational needs of disadvantaged youths, demonstration and dissemination projects, and for establishing and operating state Research Coordinating Units that administer state vocational research programs and disseminate research findings. Fifty percent of the funds under Part C are allotted to states (with varying matching requirements), while the other 50% of the funds are reserved for the Commissioner of Education and are used for project grants. This study of vocational education services to the Navajo Nation was financed with the Commissioner's Part C funds.

2. Part D. Exemplary Programs and Projects

Formula grants are awarded to states for the purpose of stimulating new ways to create bridges between school and employment. The Commissioner reserves 50% of the available funds for discretionary grants and/or contracts with at least one project in operation in each state. The remaining funds are allocated to the state boards for vocational education for similar use.

3. Part E. Residential Vocational Education

The Commissioner of Education is authorized to make grants to state boards, colleges and universities, and others for demonstrating the

Table II-3

Total Federal, State and Local
Vocational Education Expenditures Under
Parts C, D, F, G, and H, FY 1974*

	ARIZONA	%	NEW MEXICO	%	UTAH	%
Total Voc. Ed. Expenditures	$27,288,959		$12,476,839		$20,468,305	
Part C	184,744	0.6	76,210	0.6	69,348	0.3
Part D	155,779	0.4	151,426	1	72,224	0.4
Part F	3,040,458	11	2,336,379	19	1,575,888	8
Part G	4,443,428	16	456,539	4	438,247	2
Part H	164,072	0.6	87,402	0.7	52,348	0.3

Source: U.S. Department of Health, Education, and Welfare, Vocational and Technical Selected Statistical Tables, Information No. III, 1974.

feasibility of residential vocational education for students 15 to 21 years of age. Formula grants are also authorized for states to pay for the costs (90% of federal share) of planning, constructing, and operating residential vocational schools. No funds have been allocated for this part, and the program has never been put into operation by the Office of Education; however, it might be of particular relevance to Navajo (and other Indian tribes) if the program were activated.

4. Part F. Consumer and Homemaking Education

Formula grants are provided to assist states in conducting training programs in consumer and homemaking education. Part F programs are designed to prepare students for the occupation of homemaking with emphasis on the dual role of homemaker and wage earner. States must use at least one-third of the federal funds for programs in economically depressed areas or localities with high unemployment rates, a requirement which should provide significant special funding to Navajo. Fifty percent state and local matching is required except where the funds are used in depressed or high unemployment areas; in those cases, only 10% state matching is necessary.

5. Part G. Cooperative Vocational Education

Formula grants for cooperative education programs are allocated to states for programs designed to enable students to receive vocational instruction in the school and related on-the-job training through part-time employment. Students must be at least 14 years of age and are paid the minimum wage or a student-learner rate established by the Department of Labor. Federal support may cover program operation, added training costs to employers, payment for services or unusual costs to students while in training, and ancillary services. No state matching is required.

6. Part H. Work-Study Programs for Vocational Education Students

Funds are provided to states for work-study programs to assist economically disadvantaged full-time vocational educational students, ages 15-20, to remain in school by providing part-time employment with public employers. 1/ This is essentially an income-maintenance program for the economically deprived youth in school. About 2% of the funds are used for administration of the program. Priority should be given to areas with high dropout rates and youth unemployment. Funding is 80% federal and 20% state and local.

1/ The term "public employers" is not defined in the regulations. Since the Navajo Tribe is considered a unit of local government it would appear that, for purposes of Part H, tribal government could employ such students.

7. Part J. Bilingual Vocational Education

Part J of the Vocational Education Act which began last year (FY75) is directed at the critical problem of persons with English language difficulty obtaining vocational training and preparing instructors possessing job knowledge and skills as well as dual language capabilities. This is a national program that is administered on a discretionary basis. There is no formula that requires certain amounts to go to each state. The approporation for Part J last year was $2.8 million, and the appropriation for next year is the same. During the last fiscal year, there were no bilingual projects funded in Arizona; one project was funded to New Mexico Highlands University for Spanish-speaking people. The only project funded last year for Indians was to Mary College in North Dakota.

The regulations and guidelines for applying for Part J funds, as with all federal programs, are published in the Federal Register. In addition, the HEW Regional Offices, the state departments of vocational education and the Research Coordinating Units receive copies of the application packages; however, they are not obligated to disseminate this information to the local school districts or Indian tribes.

Our interviews with local school districts revealed that they were not aware of the availability of bilingual vocational education funds in time to respond to the application deadline; they heard about the program only by chance through information from the state department of vocational education which arrived too late for the school districts to respond. A better mechanism for disseminating Part J information must be developed so that local school districts with large Indian populations and tribes themselves have access to it. The vast majority of the Indians live in the Southwest and 12% of all Indians speak Navajo as their mother tongue, four times more than any other mother tongue language save English. 1/ Yet these school districts do not have direct access to the guidelines concerning funds for bilingual vocational education. A director of vocational education in a school district on Navajo Reservation that comprises the largest group of Native American speakers does not have access to daily publication of the Federal Register.

D. Summary

In summary, funds available under the Vocational Education Act are by legislation and regulation to be directed to population groups with the greatest level of need for services. Certainly, there is no other group in the States of Arizona and New Mexico with more need than the Navajo; therefore, the Navajo Tribe should receive a proportionately larger share of the funds. A detailed analysis of state funding patterns in Arizona and New Mexico is contained in the following chapter.

1/ It should also be noted that 76% of the Indians in Arizona, and 70% of those in New Mexico speak an Indian language as a mother tongue. U.S. Department of Health, Education and Welfare, Office of Special Concerns. A Study of Selected Socio-Economic Characteristics of Ethnic Minorities Based on the 1970 Census, Vol. III: American Indians, Washington, D.C.: DHEW, July 1974.

Chapter III. Secondary School Vocational Education

A. State of Arizona

1. The State Plan for Vocational Education

The State Plan for Vocational Education in Arizona is prepared by the State Department of Vocational Education. The plan is primarily the product of the analysis and development work carried out by staff of the department with limited public participation.

The plan is primarily a procedural document. As such, it defines how the state will make certain decisions, but not what those decisions will be. For example, it presents the formula for distribution of funds to secondary schools, but does not indicate the amount of funds that have been or will be provided. Part I of the plan defines the administrative provisions for conducting all vocational education programs, services, and activities. In a sense, it is perhaps the most crucial part of the plan, since it defines the criteria by which the state will determine how much vocational education money is allocated to the different school districts and community colleges. Specific criteria and formulas are defined for funding of disadvantaged, handicapped, exemplary, consumer education and other programs which are defined in the vocational education legislation. Part II of the plan, which the state describes as "the heart of the plan" contains estimates and projections which are not intended to be legally binding on the state, but which are quantifiable and measurable." 1/ Included in the State Plan is a table identifying employment opportunities as they relate to vocational education programs. 2/ The data are presented on a state-wide basis only and, therefore, provide no basis for analyzing the needs of particular geographic regions such as the northern counties of Arizona where the Navajo reservation is located. Table 2 in the State Plan describes the state-wide population to be served, 3/ and Table 3 identifies annual and five year needs, expected outcomes, and budgetary requirements to achieve the goals. 4/ The budget distinguishes available funds from funds needed. It is in Table 3 that the State Plan makes its only reference to Indian needs, stating:

> "There is need to study the advisability of increasing field staffing to service Northern Arizona Indian reservation high schools and to generally increase field staff services throughout the state." 5/

1/ Arizona State Board for Vocational Education. Arizona State Plan, 1975-76: Vocational Education. August, 1975, p.i.

2/ Ibid., p. II-1.

3/ Ibid. p. II-26.

4/ Ibid. p. II-37.

5/ Ibid. p. II-37.

The absence of information concerning vocational education in school districts serving the Navajo people, or Indian people across the state, is reflection of the State Plan requirements which are defined by the Office of Education. The Bureau of Occupational and Adult Education (BOAE) in the Office of Education does not require that the states develop a plan which defines service priority among special population groups or problems in the delivery of vocational education services to such groups. The State Plan is, rather, a federal requirement which must be fulfilled if the state is to receive federal money; it demands little in terms of policy or program emphasis. This situation results in large measure from the lack of an affirmative policy on services to Indians and other ethnic minorities. This fact does not diminish the responsibility of the state to serve Indian people, nor does it eliminate the expectation that a state, such as Arizona, with a significant Indian population would have a separate policy on vocational education services to Indians and would give special consideration to their needs.

Mechanism for Influencing the State Plan

The Federal vocational education regulations provide two vehicles that were designed to assure public input including the input of the Indian community into the State Plan: a) public hearings and; b) the state advisory council.

a) Public Hearings

Federal regulations require that the State Plan include a statement "describing the method by which and the extent to which reasonable notice and opportunity for a hearing was offered by the State Board prior to the adoption of such plan or amendment including a description of how and to whom such notice of public hearings was given, the manner in which such hearings were conducted, and the results of such hearings." 1/ The Arizona State Plan requires that "a public hearing regarding the various parts of the State Plan will be conducted through the State Board for Vocational Education for Arizona." 2/ Only a single hearing is required by the State Plan and furthermore notice of the hearing is required only in the daily newspaper operating in Maricopa County.

Two important issues must be considered here. First, the single hearing is insufficient to allow interested parties an opportunity to participate. Two hearings were held this past year, one in Phoenix and the second in Prescott, Arizona, but that is, in our estimation, still inadequate to assure substantive public input. In a state as expansive as Arizona, many people are unlikely to participate in a single (or even two) hearings. This is particularly true of the Indian population living in isolated areas. Even if representatives of the Navajo Tribe wished to participate in the hearing, it is unlikely that the Tribe would have access to the public notice because the newspaper published in Maricopa County is not sold in Window Rock.

1/ 45 CFR 102, 102.31 (c) (4).
2/ Arizona State Plan

The events surrounding this year's hearings are a telling case in point with regard to the inadequacy of the notice provisions. A staff member of the Navajo Division of Education heard only by chance about the vocational education hearing which was to be held in Prescott through an employee of the Navajo Tribal Utility Authority. The Division then lodged a formal complaint with the State Advisory Council for Vocational Education as to the inadequacy of the notice that they had been provided. In response to the complaint, a notice was published in the Navajo Times three days before the hearing was to be held in Prescott, Arizona - 200 miles from Window Rock. More effective notice provisions (including ads in key newspapers across the state, and letters to educational officials, with special attention to representatives of minority groups and Indian tribes) must be developed to assure that representatives of all organizations and institutions which have a stake in vocational education services will have the opportunity to participate in the hearings.

Public hearings on the State Plan regardless of the number, offer a very limited opportunity for the consideration of the vocational education problems of a special population group such as the Navajo. This is especially true, given the absence of any information in the plan concerning the needs at Navajo, or the needs of any other Indian tribe. The consideration of special problems and populations groups is ostensibly within the purview of the State Advisory Council on Vocational Education.

b) Arizona State Advisory Council for Vocational Education

According to the federal regulations, the Advisory Council is "to evaluate the range of vocational education programs, services, and activities under the State Plan and publish and distribute the results thereof." 1/

The Council is required to include one representative of school systems with large concentrations of academically, socially, economically, and culturally disadvantaged students; one representative of the handicapped; and "at least one person" representative of, and knowledgeable about, the poor and disadvantaged who are not qualified for membership under any other membership category. The Arizona Council is legally constituted in accord with these requirements. Our interviews--with the Council as a whole and individually with the Indian member of the Council--indicated that the Council had never examined the special problems of Indians. We were informed that the Council does not examine the vocational education needs of a particular racial or ethnic group, but, rather, examines the needs of the state as a whole, without regard to racial/ethnic designation. This response is all too familiar for persons familiar with the problems confronted by minority groups. Prior experience graphically illustrates that unless programs and services are examined from the perspective of the unique needs of the minorities, and particularly Indians,

1/ 45 CFR 102, 102.23 (c).

these groups tend to receive less than their fair share of the services and resources, and the services which are provided are not responsive to the unique needs and characteristics of these groups. Our analysis of funding patterns for vocational education in the State of Arizona which is presented in the next section confirms this concern.

In summary, the federal requirement of a public hearing and a representative Advisory Council do not provide a viable opportunity for Navajo tribal input to influence the quantity and quality of vocational services available to tribal members. The absence of policy at the federal and state levels which takes into account the special needs of Navajo as well as other Indians further compounds the difficulty for the Tribe to effectively influence vocational education policy and programs. Certainly, a re-examination of this system is warranted both in terms of the needs of the Navajo Tribe, as well as other groups. We would recommend as a beginning that there be a section of the Arizona State Plan which explicitly outlines a state policy toward vocational education on the Navajo reservation. Such a policy statement could be made a requirement of the federal regulations concerning State Plans since it is essential that states be required to consider the manner in which they will work with Indian tribes that will be receiving funds under the Indian provisions contained in the new vocational education legislation. We would also suggest that a special hearing on the State Plan be held to consider how it will meet the needs of the Indian population of the state. Finally, we would suggest that it is the obligation and responsibility of the State Advisory Council of Vocational Education to take a special look at the problems of vocational education for Indians in Arizona; to ignore the problems as is now the case, is to shirk their responsibility.

2. State Funding of Secondary School Vocational Education Programs

There are two major categories of vocational education funding available to local school districts from the State. The first category is entitlement funding which is provided on a formula basis. The second category can best be described as a series of discretionary grant programs in which local school districts as well as community colleges apply and compete for funds from the state; the state determines what districts or colleges will be funded and for how much on the basis of criteria which are set forth in the State Plan. Included in this second category are disadvantaged, handicapped, and new programs funds.

The amount of funds from Part B which are made available for entitlement funding and the discretionary grant programs is determined in part by the requirements of Federal law and in part is subject to the discretion of the State of Arizona. Federal requirements for allocating Part B funds by the State are as follows:

Type of Arizona Program	Who Determines Amount of Funds	Method of Allocation
Secondary Schools	State decision	Entitlement
Postsecondary Schools	15% set-aside by law	Entitlement
New Programs	State decision	Proposals: State discretion
Disadvantaged Programs	15% set-aside by law	Proposals: State discretion
Handicapped Programs	10% set-aside by law	Proposals: State discretion

Table III-1 illustrates Arizona's allocations to specific Part B categories. Given this allocation method, the critical question for the Navajo Tribe is whether the school districts serving Navajo children are receiving a fair share of the funds available in light of federal allocation criteria. In the following pages the Arizona formula for distribution of the entitlement funds is examined, followed by an analysis of the funding of "new", disadvantaged, and handicapped programs.

a) Arizona Entitlement Formula for Secondary Schools

Explanation of the Formula

Entitlement funds are allocated to individual school districts. There are two steps involved in determining the amount that will go to each school district:

(1) determining the amount for each county in the state; then
(2) determining the amount for each school district within the county.

Table III-1

Arizona
Allocation of Federal/State Funds to
Categories Under Part B for FY 75 and FY 76

Part B Categories	FY 75		FY 76	
	Amount	% of Total Part B	Amount	% of Total Part B
Entitlement-Secondary	$2,053,134	31%	$2,430,817	38%
Entitlement-Postsecondary	560,000	8%	560,000	9%
New Programs	1,420,931	21%	618,123	10%
Disadvantaged	1,127,467	17%	994,925	15%
Handicapped	481,298	7%	525,378	8%
Area Vocational Education	356,189	5%	379,720	6%
Adult	570,000	9%	700,000	11%
Guidance and Counseling	---	--	156,000	2%
Contracted Instruction	57,937	1%	96,636	1%
TOTAL PART B	$6,626,956		$6,461,599	

NOTE: Amount includes federal/state funds only; does not include local expenditures.

SOURCE: Arizona Department of Career and Vocational Education.

1. Determination of Allocation by County

The allocation to each county is the sum of two factors: (a) a need factor; and (b) an effort factor. 1/ The following information from the Arizona State Plan describes how these factors are determined:

(a) To Establish Need

Six criteria are considered in establishing need:

1. Population--last complete fiscal year.2/
2. Families with less than $3,000 income.

1/ For FY1977, the entitlement monies to secondary schools totalled $2,250,000. One half of this sum, $1,125,000, is distributed on the basis of need for each county and one half on the basis of county effort. A county may, for example, receive $90,000 on the basis of need and $40,000 on the basis of effort for a total of $130,000.

2/ Example: The State's population for July, 1974 was 2,150,000. Coconino County's population in 1974 was noted as 62,700 or a factor of 2.92 percent of the State's total population.

3. Unemployed persons fourteen years of age and over.
4. Number of employed persons.
5. Persons fourteen to seventeen years of age not enrolled in school.
6. High school enrollment--last complete fiscal year.

Each of the six items is factored separately using the same approach noted in the example. The factors for each county are then added together and divided by six (the number of factors). That average determines the need allotment for the county. For example, in the proposed FY 1977 allocation formula, Apache County has a need factor of 2.21. This means that Apache County will receive 2.21% of the $1,125,000 to be distributed on the basis of need, or $24,862.

(b) To Establish Effort

The second major portion of the formula deals with the county effort. The same factoring concept is utilized. The following items are used to determine county effort: 1/

1. Vocational Education Enrollment--last complete fiscal year.
2. Vocational Expenditure by local school districts of each county.
3. Average district tax by county--last complete fiscal year.

The effort factor for Apache County in FY 1977 as proposed is 2.92. Therefore, Apache County will receive $32,850 for effort.

Adding the need ($24,862) and effort ($32,850) allotments together determines the total county's allotment, $57,712.

2. Determination of Allocation by School District

The next step is to break down the County Allocation by school district. This step utilizes a procedure similar to that noted above. Two major effort factors of the individual school district are included. 2/

1/ Example: Again, as above, each item is taken individually to establish a county factor for that item. The factors for each county are added together and divided by three. That average determines the effort factor for the county.

2/ Example: The total state high school Vocational Education enrollment becomes the total or one hundred percent figure and each county's percent of total is determined. Each district's Vocational Education enrollment is used to figure that district's percentage of the county's total. The Vocational Expenditure is similarly calculated. The two items are then factored by school districts in the county and divided by two to obtain a district's factor. This factor determines the amount of entitlement for that school district in a given county. A minimum grant of $500 per vocational class is available up to a maximum under this grant of $3,000 for the school receiving an entitlement amount that is less than $3,000.

a. Vocational Education Enrollment--last complete fiscal year.
b. Investment by Local District--last complete fiscal year.

The analysis of the Arizona secondary schools entitlement formula which was conducted as a part of this study is not the first such analysis. In a special review of the Arizona formula for allocation of vocational education funds in June of 1975, representatives of that Bureau of Occupational and Adult Education determined that:

> The present system of allocating Part B funds to the purposes in the law does not seem to fully comply with Regulation 102.51(d). Also, the present allocation system of Part B funds to LEA's only partially seems to give consideration to the four criteria in the law. The State staff would like additional guidelines and assistance in revising the entitlement formula. It was suggested that the entitlement formula be modified now to give more consideration to the manpower needs, ability to pay, and relative cost factors. 1/

Our own analysis of the formula follows.

Analytical Methodology

Each of the factors in the Arizona entitlement formula is critiqued in terms of its implications for the counties and the reservation school districts, as well as its general equity. In some cases, the validity of the data being used by the state is questioned. Where alternative criteria or data are proposed, tables are included which show the impact of the revised criteria or data on the total funds available to each reservation county, and the amount the county would receive if the revised criteria or data were applied. Maricopa County has been included in the tables for comparative purposes.

Determination of Allocation by County

The entitlement money a county receives is the sum of an amount determined by need and an amount determined by effort. The most unusual phenomenon in the present formula is that the counties serving the reservation receive more funds based on effort than they receive based on need. It is surprising, even ironic, that counties in which the school districts are facing major financial crises and where perhaps the poorest people in the United States live, are receiving more for effort than for need. (See Table III-2.)

1/ Report of Special Review of Vocational Education Fund Allocation Procedures in Arizona, BOAE, June 20, 1975.

Table III-2

Entitlement Funds for Selected Counties for FY77

	Effort	+	Need	=	Total County Allotment
Apache	$ 32,850	+	$ 24,862	=	$ 57,712
Coconino	80,100	+	34,702	=	114,862
Navajo	59,062	+	31,612	=	90,674
Maricopa	406,688	+	609,975	=	1,016,663

SOURCE: Arizona Department of Career and Vocational Education, Entitlement Worksheet.

Factors in Determining County Allocation

1. Need Allotment

(a) Population. Utilizing the entire population instead of the population of 15-19 year olds (as utilized by the federal formula for allocations to the states) for the secondary school entitlement reduces the amount received by school districts with large numbers of Indian children in their population, such as school districts serving Navajo. The median age of Indians in Arizona is 17.1 years compared to 28.1 years for the total Arizona population. In addition, the presence of large retirement communities in Maricopa and Pima counties results in unreasonable benefits to these counties from elderly persons who are not in the secondary school vocational education target population.

To include persons who are not in the population to be served by secondary school vocational education in order to determine how much secondary schools receive appears to be a contradiction. (Arizona, as noted in Table III-1, allocates funds separately for adults and postsecondary students.)

Substituting the 1970 Census data on 15-19 year old population for the total population would result in increases for the reservation counties because the weight of the population factor would increase for those counties.

Table III-3

Weight Based on 15-19 Year Old Population
and Total Population

	Weight Based on Total County Population	Weight Based on 15-19 Year Old Population 1/
Apache	1.88	2.08
Coconino	2.90	3.58
Navajo	2.49	2.96
Maricopa	54.78	53.02

(b) Families under $3,000 -- This is one factor that works in favor of the counties with large numbers of Indians. However, since the factor used in determining the allocation from the state to the county is not repeated in determining the allocation of funds from the county to school districts, the school districts serving the reservation that have the vast majority of families with incomes under $3,000 do not benefit from this criterion in proportion to their presence in the county population. In effect, their presence brings funds into the county, for the benefit of non-reservation districts. (See discussion of County to School District Funding).

(c) Unemployed -- Utilizing an Employment Security calculated unemployment figure works severely against the interest of rural counties with large numbers of Indians. The issue is the exceptionally low labor force participation rate of Indians. This is not due to Indians' unwillingness to work but rather the fact of the limited number of jobs on the reservations and the fact that Indians are not trained for many of the jobs that do exist.2/ Thus, although the state labor force participation rate is 74% for men and 39% for women, it is 47% for Navajo men and 22% for Navajo women. 3/

Thus, the reported unemployment rate of 7.3% in Apache County, 5.9% in Coconino and 6.5% in Navajo is a percentage of the seriously deflated labor force participation rate and in no way reflects the number of unemployed on the reservation. Data available in the Navajo Office of Employment and

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1/ 1970 Census.

2/ Nationally, urban Indians have a labor force participation rate of 72% for men and 42% for women, compared to 77% and 41% respectively for the total population.

3/ 1970 Special Census Report - American Indians.

Training Administration's Plan indicate a reservation unemployment rate of between 41% and 64% depending on the definition of unemployment. The Department of Commerce indicated in 1973 an unemployment rate of 43%. 1/ These Navajo and Department of Commerce figures reflect the real situation on most Indian reservations across the country where many Indians have been totally discouraged from seeking work and, therefore, are no longer counted among the unemployed. If the discouraged persons nationally are included in determining the unemployment rate, the rate rises approximately 1%. Given the level of discouragement which has occurred on Indian reservations, when discouraged Indians are included, the reservation unemployment rate rises to more than 40%.

Data for November 1976, show that the national unemployment rate was 7.9% 2/. Comparison of the Navajo reservation and national unemployment rates from the above two sources shows a difference of over 32 percentage points; unemployment on the Navajo reservation, even if one were to include the discouraged worker in the national rate, was more than four times greater than that for the nation as a whole.

Table III-4

Weight Based on Reported Unemployment and Actual Unemployment

	Weight Based on Reported Unemployment by Employment Security	Weight Based on Actual Unemployment (To State Average)
Apache	1.67	14.0
Coconino	2.88	6.3
Navajo	2.17	12.8
Maricopa	60.67	-19.1

We would propose that the state must recognize the real unemployment situation on the reservation in its formula. Since it was not possible to reconcile reservation and county unemployment rates for this study, we have utilized a different method which takes into account the low labor force participation rate. Using 1970 census data, we have computed an unemployment rate for the three counties and the state using the following formula:

1/ Federal and State Indian Reservations, U.S. Dept. of Commerce, 1973, p. 63.

2/ U.S. News and World Report, "Trend of American Business," Washington, D.C., May 12, 1975.

State Labor Force participation rate minus local labor force participation rate plus reported unemployment rates equals actual unemployment rate.

For example, the State of Arizona labor force participation rate (male and female combined) was 59.4%. Apache County's labor force participation rate was 52.7%. The county's unemployment rate was 7.3%. Therefore, the actual unemployment rate for Apache County is 14.0% (59.4% - 52.7% + 7.3%).

(d) 14-17 Year Olds Not in School -- Data included in the State Plan from a 1968 EDA study show exceedingly different dropout rates for students than the data used by Arizona on their entitlement worksheets for 14-17 year olds not in school in the three reservation counties. 1/ In the table below, we have utilized the EDA data from the State Plan and the 1970 Census to determine the number of 14-17 year old dropouts.

Table III-5

County	Dropout Rate 14-17 Year Olds 2/	X	14-17 Year Olds 3/	=	14-17 Year Old Dropouts	14-17 Year Old Dropouts Reported on Worksheets
Apache	34.56	X	2,858	=	988	579
Coconino	14.75	X	4,910	=	724	636
Navajo	39.08	X	4,054	=	1,584	454
Maricopa	12.21	X	72,687	=	8,897	11,298
State	14.69	X	137,094	=	20,139	20,530

The differences in the number of dropouts using State Plan data in contrast to the 1977 formula yield obvious contradictions. A decrease in the number of dropouts in Navajo County of more than 1,100 is incomprehensible as is the rise of 2,401 in the number of dropouts in Maricopa. Given the apparent unreliability of the data, we would propose that data from the 1968 EDA study be utilized in determining this element of entitlement or, if these data are also not correct, a reexamination of the method of computing these data be undertaken. In either case, we would anticipate that the weight for this factor would certainly increase in the reservation counties, thus increasing their allocation.

1/ Arizona does not indicate a source for the data they used on worksheets.

2/ Arizona State Plan, p. II-18, 1968, EDA Study.

3/ 1970 Census.

Table III-6

Weight Based on Revised Data on 14-17 Year Olds Not in School

County	Weight Reported 1977 Worksheets	Weight Based on 1968 Data
Apache	2.82	4.91
Coconino	3.10	3.60
Navajo	2.21	7.87
Maricopa	55.03	44.18

(e) Numbers of Persons Employed -- Utilizing the number of employed persons in the need allotment raises the question of how this particular factor reflects the need for vocational education. Surely the fact that there are fewer jobs in a particular county should not work to the detriment of a student seeking vocational training. In fact, the opposite is true. Counties with very low numbers of employed persons should be receiving more funds in order to develop a trained labor force which can attract industry. Using only persons employed also fails to consider projected job opportunities which are anticipated on the reservation where the Navajo Tribe can exercise Indian preference in hiring. If the principle of Indian preference is applied, then all jobs presently held by whites should be considered part of the projected job opportunities. The population of the three Northern counties is 46% Navajo, but of those employed in the three counties, 23% are Indian (See Table VII-1). Even on the reservation, 38% of those employed are non-Navajo (See Table VII-2). 1/ Most of these non-Navajos are employed there because there are no Navajos trained to fill the jobs; many of these jobs could be filled by Navajos if they were trained in vocational education courses.

Given these various factors we would propose that numbers of persons employed be dropped from the formula.

(f) Total Enrollment -- Total enrollment as a factor in any school district as a means of determining need for vocational education is open to considerable question. Does a school district which places greater emphasis on academic education have the same need for vocational education as one which emphasizes vocational education? The outcome of such a method would very likely be a sophisticated vocational education program for a few students in an academically-oriented district. Certainly vocational education enrollment, were it not constrained by the absence of money, would be a more viable

1/ Data approved by Office of Revenue Sharing, with the concurrence of the U.S. Census Bureau and the BIA.

factor. Vocational education enrollment and a factor for allowing additional funding until the school districts were equalized on the basis of need, would provide an even more equitable factor.

An additional issue that must be considered in utilizing total enrollment as a factor is the number of Navajo students enrolled in BIA schools. The BIA students are counted by the federal government in determining the allocation to the state. The state receives funds for these students and is required to provide services or the opportunity to participate in vocational training (See discussion on Regulations on Private Non-Profit Schools, Chapter VI). Therefore, utilizing figures of students enrolled only in public schools seriously undercounts the number of those to be served and yields a smaller amount of vocational education resources available to serve Navajos.

We propose that a more equitable factor could be derived using the vocational education enrollment and an equalization factor.

Table III-7

Weight Based on Vocational Enrollment and Percent BIA Students

County	Weight Based on Total Enrollment	Weight Based on Voc. Ed. Enroll. and % of BIA Students plus a 10% Equalization Factor 1/
Apache	0.58	3.66
Coconino	3.29	4.47
Navajo	2.63	3.31
Maricopa	53.89	48.38

1/ Figures were obtained by adding Vocational Education Enrollment plus a percentage for BIA enrollment equal to the percent of Indians in vocational education the county to total Indian enrollment in the county; a 10% equalization factor was added to equalize for prior underfunding of school districts, since enrollment is a factor of funds available to spend on vocational education.

2. The Effort Allotment Includes Three Factors:

a. Vocational Enrollment (See discussion above)

b. Vocational Expenditures

c. Average Tax Rate

(a,b.) Vocational Enrollment and Vocational Expenditures

These two factors are virtually the same. The scope of a school district's expenditures will determine the number of students who can enroll in vocational education courses. Given the similarity in the two factors and our having utilized vocational enrollment in the need portion of the formula, we propose to drop vocational enrollment from the effort factor.

The vocational expenditures of the local school districts are necessarily linked to the entire system for financing public education in the State of Arizona, and the status of the reservation districts in relation to that system. Reservation districts have a very limited tax base due to the presence of non-taxable reservation land. To make up for the lack of a tax base, the federal government appropriates funds under the Impact Aid (P.L. 874) program; these funds are in lieu of taxes. The State of Arizona does not consider Impact Aid to be in lieu of taxes in its formula for financing local school districts; therefore, the Indian school districts do not receive as much of state aid as they would otherwise. Table III-8 shows how substantial the additional state money coming into the districts would be, if Impact Aid were considered in lieu of local taxes.

Table III-8

Actual State Aid and State Aid Recalculated with PL 874 Revenues Included, for 16 Arizona Districts. Actual State Aid Information from DNA Legal Services, Window Rock, Arizona. PL 874 Information from Arizona Superintendents Report, 1973-74.

	Actual State Aid 1974-75	PL 874 Revenue 1973-74	1974-75 Recalculated State Aid Including PL 874 Revenue in Calculation	Difference Between Actual and Recalculated State Aid	Per cent Increase in State Aid
Chinle	2,096,565.69	$ 1,017,710	$ 3,019,087.60	$ 922,521.41	44%
Ganado	665,952.57	433,041	1,098,993.51	433,041.00	65%
Puerco	365,952.57	142,356	463,105.91	97,173.34	27%
Windcw Rock	1,513,448.73	821,403	2,014,163.18	500,714.45	33%
Tuba City Elem.	654,502.19	468,089	997,419.75	342,917.56	52%
Tuba City H. S.	387,018.98	159,450	530,257.97	143,238.99	37%
			117,944.44 *	93,454.37 *	382% *
Kayenta	395,526.58	359,410	551,072.56	155,545.98	39%
Monument Valley HS	209,740.44	176,470	237,490.98	27,750.54	13%
Keams Canyon	381,151.27	135,023	432,644.38	51,493.11	14%

* Computed using actual number of classrooms in district.

Source: Study of Title II of P.L. 93-638. A report prepared for the Bureau of Indian Affairs by the National Indian Education Association, Minneapolis, September, 1975.

Because the local districts do not have all the state money they might, their vocational expenditures, as well as their total expenditures, are constrained; therefore, they do not do as well under the formula.

We do not propose to remove the vocational expenditure category; we would hope, however, that the State of Arizona would move toward a more equitable system of financing public education.

(c) Average Tax Rate

This factor properly reflects the effort which school districts in a county are putting into education and should be maintained in the formula.

SUMMARY

In summary, the revised formula which we are proposing to determine county allocations would be:

NEED:

$$\frac{\text{Pop. 15-19} + \text{Families Under \$3000} + \text{Average Unemployment} + \text{14-17 Yr. Old Not in School} + \text{Vocational Enrollment}}{5}$$

EFFORT:

$$\frac{\text{Vocational Expenditure} + \text{Tax Effort}}{2}$$

Applying this formula on a statewide basis as noted in Table III-9 results in a significant and appropriate shift of funds into the three counties serving the reservation. A similar shift would also occur for other rural counties in the state.

Two other factors have not been considered in the Arizona formula, both of which are contained in the federal regulations: (1) per capita income, which due to the large families among the Navajo is likely to be more advantageous as an index of poverty than families with an income under $3,000; and (2) the need to give special consideration to school districts that have special burdens "such as bus transportation for students, or unusual and excessive maintenance costs for outdated buildings and facilities, which are not usually part of the cost of education provided by other local educational agencies in the State." 1/ This is clearly the situation in most of the school districts serving the reservation students. A special factor to reflect these needs should also be considered in any revision of the formula.

D. Determining Local School District Allocations

When allocating funds from the county to the school district, the state formula eliminates need and utilizes only effort. As noted earlier the non-reservation districts which do not have the same level of need as the reservation districts receive the benefit of the Navajo need. A need factor must be built into the allotment of funds from the county to the local school district level. The state argues that need is not included because need data are not available for local school districts.

To argue that the data are not available to carry out this breakdown is not correct. In 1970, the Office of Education initiated a significant effort to begin to identify numbers of poor children in LEAs. OE produced School District Data Tapes which match 1970 Census counts of the poor with 1970 boundaries of all LEAs with student populations above 300. The tapes are now being corrected and revised to reflect 1974 LEA boundaries. 2/ While these data pose major problems because they do not reflect the serious undercount of the Navajo population which occurred in the 1970 Census, they do provide a starting point. (In 1970, the Census Bureau counted only 89,000 Navajos; as of 1973, a total population of the 125,520 Navajos had been accepted by the Office of Revenue Sharing with the concurrence of BIA and Census; the large majority of the undercounted groups are likely to be those with the greatest need.) Given this differential, statistical techniques would have to be applied to make the school district data consistent with updated population estimates. However, such techniques can be applied and data developed which would enable the state to use a need factor to allocate funds from the county to school districts within each county in the state.

1/ Regulations, Section 102.56(b)(2).

2/ "1970 Census Fourth Count-1970 Elementary and Secondary General Information Survey," prepared under the direction of William Dorfman, U.S. Office of Education.

Table III-9

County Entitlement Using Revised Criteria and Data

(1) Need Factor:

County	Pop. 15-19	Families Und. $3K	Actual Un-Employment	14-17 Yr. Olds Not in School	Voc. Enroll.	County Need Fact.	Need Allotment
Apache	2.08	5.01	14.0	4.91	3.66	5.92	66,600
Coconino	3.58	3.73	6.3	3.60	4.47	4.34	48,825
Navajo	2.96	5.39	12.8	7.87	3.31	6.47	72,788
Maricopa	53.02	42.47	-19.1	44.18	48.38	33.79	380,138
State Total	100.00	100.00	4.2	100.00	100.00	100.00	1,125,000

III-17

(2) Effort Factor:

County	Voc. Expend.	Avg Tax Rate	Effort Factor	Effort Allot.	Need Allot.	County Entitlement	Amount of Change
Apache	1.87	4.14	3.01	33,863	$ 66,600	$100,463	+$42,751
Coconino	5.55	11.75	8.65	97,313	48,825	146,134	+31,272
Navajo	1.80	11.16	6.48	72,900	72,788	145,688	+55,014
Maricopa	53.86	6.19	30.03	337,838	380,138	717,976	-298,687
State Total	10,321,228	100.0	100.00	1,125,000	1,125,000	2,250,000	- 0 -

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b) New Programs

The New Programs category represents a critical element in Arizona's vocational education funding scheme. The New Programs effort as defined in the State Plan has two parts: (1) Vocational Career Exploration Education Projects, Services and Activities, and (2) New Vocational Career Preparation Education Projects. The creation of the New Programs category is an important development in concept. It is a response to the criticisms of vocational education which were set forth by the General Accounting Office (GAO) in its review of federal vocational education. GAO decried the tendency of states and local school districts to continue to operate traditional vocational education programs which are not respnsive to changing characteristics in the labor market or to the needs and interests of the students. The reasons why states and local school districts fail to change programs are several. First, there is the inherent resistance of all programs to change. Second, teachers and administrators develop a vested interest in particular programs and manage to justify their continuation despite data and information to the contrary. Most important, however, is the fact that funds are often not available to local school districts with which to make the capital expenditures necessary to develop new vocational education programs. To encourage local districts to establish new programs, Arizona created the New Programs category. While the concept is a positive one, its implementation must be examined from two points of view: (1) has there been an equitable distribution of New Program funds among school districts across the state, given the basic regulatory criteria of Part B funds as well as the related criteria in the State Plan, and (2) given the limitations on funds to prepare students for employment, are the types of programs available for funding under the New Programs category appropriate?

For the reservation school districts, securing funds under this category is particularly important. Given their limited share of entitlement funds and limited local financing capability, these school districts have few local resources to invest in creating new vocational education programs. An analysis of the distribution of New Program funds over the past four years and the criteria for distribution is critical to the development and expansion of the vocational education system serving the reservation.

New Program Funding

The New Programs category was funded in FY76 at $618,123 or 9% of the federal and state funds. In fiscal year 1975, a total of $1,420,931 or 21% was set aside for the "New Programs" effort. (See Table III-10.)

Table III-10 shows the amount of New Program funds that have gone to the reservation school districts 1/ over the past four years. According to the 1977 Arizona entitlement worksheets, vocational education enrollment

1/ Reservation districts include: Window Rock, Ganado, Chinle, Tuba City, Monument Valley, Page.

of the reservation school districts is 4.5% of the state's total vocational enrollment. Over the four year period, the reservation districts received 6% of the New Program funds; the amount averages out slightly above the reservation districts' percentage of vocational enrollment because of a large investment of New Program funds in 1976, $105,131. This represents 17% of the state's total investment in new programs for that year. Of this amount, $69,000 went to the new Red Mesa High School in the Chinle school district.

Table III-10
New Program Funds Going to Reservation School Districts 1973-76

Year	Amt Rec'd by Reserv. Dist.	Total Amt. Expend. by State	Reserv as % of Total
1973[1/]	$ 4,530	$ 248,592	1.8%
1974[1/]	29,222	585,545	4.9%
1975	24,992[2/]	1,420,931[3/]	1.7%
1976	105,131[2/]	618,123[3/]	17.0%
Total All Years	$163,875	$2,873,191	5.7%

1/ For years 1973 and 1974 data where derived from an Analysis of New Programs prepared by the Arizona Department of Career and Vocational Education.

2/ The amount received by the reservation school districts in 1975 and 1976 was derived from the funding notification forms sent to each school district to inform them of their funding allocations.

3/ In the years 1975 and 1976, the Total State Expenditures represents the total amount available to the state for those two years as provided by the Arizona Department of Career and Vocational Education. That Department did not provide information reflecting actual expenditures for those years.

The county coordinator for Apache/Navajo district indicated that he felt that he had been successful in getting new programs in the districts he represents. 1/ Analysis of the allocation of New Programs funds shows that Apache and Navajo counties did indeed receive 10% or $130,652 of the total New Program Funds ($1,276,541) 2/ for the three year period from 1973 through 1975; the vocational enrollment of the two counties accounts for only 6% of the total state vocational enrollment. However, the vocational education enrollment of the reservation school districts represents 48% of the total vocational education enrollment in the two counties, (Table III-12); the amount that went to school districts on the reservation in Apache and Navajo counties was only 23% of the total amount of New Program funds that went to the two counties. Clearly, there is reason to examine why the off-reservation districts have been so much more successful than the reservation districts.

Table III-11

New Program Funds Going to On-Reservation and Off-Reservation School Districts in Apache and Navajo Counties 1973-75

Year	Total Amt to Apache/Navajo Counties	Amt to Off-Reserv Dist 1/ 3/	% of Total	Amt to Reserv Dist 2/ 4/	% of Total
1973	$ 32,666	28,136	86%	4,530	14%
1974	63,666	42,920	67%	20,748	33%
1975	34,320	29,320	85%	5,000	15%
Total All Years	$130,652	100,376	77%	30,278	23%

Source: Arizona Department of Career and Vocational Education

1/ Apache County High School District

2/ Chinle, Ganado, Window Rock School Districts

3/ Alchesay, Holbrook, Pinetop-Lakeside, Show Low, Snowflake, Winslow School Districts

4/ Monument Valley School District

1/ The County Coordinator represents all the school districts in Apache and Navajo counties. Some of these districts are actually on the reservation (e.g., Window Rock, Ganado, Chinle); others are located off and sometimes far from the reservation (e.g., Apache County High School District, Alchesay, Show Low).

2/ Actual funds expended, not available, under the New Programs category as reported by Arizona Department of Career and Vocational Education.

Table III-12

Vocational Enrollment for Navajo and Apache by On/Off Reservation School District

County	Total co. voc. enrollment	Voc. Enroll. off-reserv. school dist.	% of Total	Voc. Enroll. on-reserv. school dist.	% of Total
Apache	1,300	401[1/]	30%	938[2/]	70%
Navajo	1,360	961[3/]	71%	399[4/]	29%
Total (2 Counties)	2,759	1,362	52%	1,337	48%

Source: Arizona Entitlement Worksheets

1/ Apache County High School District

2/ Chinle, Ganado, Window Rock School District

3/ Alchesay, Holbrook, Pinetop-Lakeside, Show Low, Snowflake, Winslow School Districts

4/ Monument Valley School District

Program Emphasis

The New Programs category includes both Vocational Career Exploration Projects and New Vocational Career Preparation Projects. The Career Exploration Projects are to assist individuals in making occupational choices, providing exploratory courses designed to familiarize individuals with a broad range of occupations and prepare individuals for enrollment in vocational technical programs. The Career Preparation Projects are to prepare individuals with the skills necessary for employment and/or for more advanced vocational programs.1/

The emphasis in New Program funding over the first three years of the program was clearly at the junior rather than the senior high school level. Sixty-four percent of the New Programs that have become available to the three Northern counties have funded for grades 7 and 8 courses that are career exploration in nature, rather than programs designed to train students for skills that would lead to employment. (It should be noted that for the state as a whole, 68% of the New Programs for the three years went to grades 7 and 8.) 2/

1/ Arizona State Plan

2/ Analysis of New Programs as provided by the Arizona Department of Career and Vocational Education.

Table III-13

Grade Level of New Programs

	Number of Programs			
	Grade 7-8		Grade 9-12	
	#	%	#	%
Apache County	3	50	3	50
Coconino County	4	50	4	50
Navajo County	11	79	3	22
Three Counties	18	64	10	36
All Counties	147	68	68	32
Total	165	68	78	32

Source: Arizona Dept. of Career and Vocational Education.

The emphasis on career exploration, in the absence of adequate career preparation programs seems questionable. This is particularly true because Arizona supports a career education program which could finance some of the activities funded under New Programs.

The three Northern counties received a total of $342,307 for Career Education from the state.[1/] This amount is more than the total vocational education entitlement money received by the three counties. ($263,248 for FY77, $219,669 for FY76.) In these counties, the need is clearly to create new courses which will prepare students for opportunities in the labor market. To offer a student a career exploration program in junior high school when training opportunities in the occupational areas do not exist is likely to create only frustration for the students.

1/ Arizona Department of Education, Project Approval Forms, 7-11-75 Coconino, 7-24-75 Apache/Navajo.

Funding Criteria

The criteria by which the state allocates New Program funds are subject to question, particularly from the point of view of poorer school districts. The criteria for funding are the same for both exploration and preparation projects with the exception of criterion (c). 1/

(a) The program has not been previously available to students.

(b) Funds requested will be used for the initial costs in establishing the program (exclusive of construction).

(c) Career Exploration: Local funds, which may be in-kind, will be used to supplement State/Federal funds requested.

(d) Career Preparation: Project budgets will reflect the following:

(1) A reasonable level of local funding, some of which may be in-kind, to supplement State/Federal funds requested.

(2) Funds requested limited to equipment valued at $50 or more, salaries, and employee-related costs.

(3) Total costs consistent with prudent planning in terms of the number of students to be served.

(e) Funds granted under this plan will be expended during Fiscal Year 1976. Operational costs during succeeding years will be paid from local funds or Entitlement.

(f) Project applications will be prioritized as follows:

(1) The occupational cluster is new to the state.

(2) The occupational cluster is new to the local educational agency

(3) The project will be offered in a new vocational education facility

(4) The occupational cluster is new to the attendance area

(5) The project involves upgrading or expansion of an existing program

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1/ Arizona State Plan

Two of these criteria work against the reservation districts. Criterion (e) requires that the local district pick up the costs of the program in its entirety following the initial year of state funding. Given the limited amount of local tax revenues, finding money to pick up the total cost of additional courses is most difficult for these school districts. Thus, districts may not, if the criteria are applied as stated, receive funds for a new program because they do not have sufficient funds to pick up the cost of the program in the following year.

Criterion (f) places highest priority on programs which are new to the state. School districts like those on the reservation which have limited vocational offerings to begin with may not need programs which are "new to the state." The essential issue is to develop courses which reflect labor market needs across the state; if such courses are new to the state, that's fine, but newness to the state, in itself, is a relatively insignificant criterion. From the Indians point of view, the issue is clear cut. Some tribes need courses new to the tribe which may be "old" to the rest of the state.

Conclusion

In general, it appears that the New Programs funds are not being targeted to assure that a comprehensive vocational education program is available in all the school districts in the state. There is clearly the capability within the State Department of Education working in conjunction with local school districts to prepare detailed plans for the growth and development of local vocational education programs which would define new program needs. New programs could then be funded in relation to the plan until such time as the programs across the state are equivalent and adequate to meet the needs of all areas of the state. To continue to fund on a discretionary basis when needs are going unmet seems to contradict national and state vocational education goals.

c) Special Set-Aside Funds

A special analysis was undertaken of each of the special set-asides in the vocational education legislation: Part A, Disadvantaged; Part B, Disadvantaged; Part B, Handicapped. In the case of each of these programs, one would hypothesize, given the social and economic problems of the reservation, that the reservation school districts would receive a significant share of these funds. But the data do not bear out the hypothesis, however, and a thorough review of state policy and procedures is absolutely essential to rectify the situation.

Disadvantaged Funds: Part A and Part B

Part A

Over the four year period, from 1972-1975, the reservation school districts received 1.6% of the total amount of funds allocated under Part A of the Act. This amount represents allocations made in 1975 only; the reserva-

tion school districts did not receive any Part A funds in 1972, 1973, or 1974 (See Table III-14). 1/ These special funds are intended to meet the special needs of disadvantaged students who cannot succeed in regular vocational education programs.

Table III-14. Part A (102b) funds going to Reservation School Districts, 1972-75

Year	Total amount expended by state	Amount received by reservation district	
		Dollar	Percent
1972	$ 189,740	0	0
1973	206,621	0	0
1974	396,060	0	0
1975	343,699	$17,040	5
Total all years	$1,036,120	$17,040	1.6

SOURCE: Arizona Department of Career and Vocational Education.

Part B--Disadvantaged Set-Aside

Examination of the allocation of disadvantaged funds under Part B to reservation school districts over the four year period from 1972 to 1976 shows that the reservation school districts received only 2.4% of the total funds allocated during that period. The Funding Notification Forms prepared by the state show that from 1975 to 1976 not one school district on the reservation received any of the funds set aside for the disadvantaged under Part B. (See Table III-15.)

Analysis of Dsiadvantaged Funding

In 1976, reservation school districts reported a vocational education enrollment of 2,205, 90% of whom were Indian. 1/ This represents 4.5% of the total state vocational enrollment of 48,697 that is used in determining the amount each county (and from which each school district within that county) will receive through entitlement. For the purpose of determining their entitlement, virtually all of the Indians are disadvantaged socially and economically according to the definition in the federal regulations.

1/ Data indicating that the reservation school districts received this funding in 1975 comes from the Director of Programs for the disadvantaged. Data from the Funding Notification Forms indicate no funds to reservation districts for 1975 or 1976.

Table III-15. Disadvantaged (4a) Funds Going to Reservation School Districts, 1972-75

Year	Total amount expended by state	Amount going to reservation districts	
		Dollar	Percent
1972	$ 576,470	$32,516	5.6
1973	613,104	49,050	8.0
1974	733,828	13,584	1.9
1975	1,127,467	0	0
1976	994,925	0	0
Total all years	$4,045,794	$95,150	2.4

SOURCE: For years 1972-74, the Director of Disadvantaged Programs
For years 1975 and 1976, Funding Notification Forms, Arizona Department of Career and Vocational Education

Using the reservation's 4.5% of total state enrollment as a benchmark, it is clear that these school districts are not receiving a fair share of the special funds set aside for the disadvantaged. But using enrollment alone is misleading, because the purpose of these funds is to reach those with "academic, socio-economic or other handicaps" as noted in the regulations quoted in Chapter II. When these additional criteria are considered, the underfunding of the reservation districts in the disadvantaged category comes into even sharper focus. The needs of the students in those school districts have been documented. As we noted in our Introduction to this report, the districts are among the poorest in the nation, and the residents of the districts are among the poorest and most needy people in the country. Under these circumstances it is difficult to understand why they are not receiving an equitable share of the special funds.

1/ Computer printout of vocational education enrollment by race, 02/05/76. Arizona Department of Career and Vocational Education.

2/ 45 CFR 102, Sec. 102.54(a).

Handicapped Set-Aside

State funding of programs under the handicapped set-aside is even more negative than for the disadvantaged. In the years 1972, 1974, 1975, 1976, 1/ not one penny of Handicapped funds was allocated to a reservation school district. (See Table III-16.) Such a funding pattern is unjustifiable on any grounds.

Table III-16. Handicapped (4a) Funds Going to Reservation School Districts, 1972-76

Year	Total amount expended by state	Amount received by reservation districts	
		Dollar	Percent
1972	$ 364,313	0	0
1973	Data not provided	-	-
1974	493,310	0	0
1975	459,373	0	0
1976	525,378	0	0
Total all years	$1,842,374	0	0

SOURCE: For years 1972-75, Director for Handicapped Programs; For 1976, Funding Notification Forms, Arizona Department of Career and Vocational Education.

The need of Navajo school districts for services to the handicapped is exceedingly high. Indians are as subject to birth defects and other causes of handicap as all other children; they also are subject to other morbidity factors not experienced to the same degree by non-Indian children. 2/ Data from the Department of Vocational Rehabilitation on the reservation are limited, but the Indian Health Service (IHS) can produce data documenting the large number of Navajo children who are deaf or partially deaf due to unrepaired otitis media, blind or with limited vision due to trachoma, and crippled due to the extremely high incidence of accidents (the largest cause of deaths in the Indian community). These are problems experienced by all Indians, but IHS data indicated they are worse for Navajos.3/ The above listed problems have been eliminated or are comparatively insignificant in the White community. The question of handicapped funding on the Navajo Reservation in Arizona begs for an answer.

1/ The Department of Vocational Education was not able to provide a breakdown of allocations for 1973 for the handicapped funds.

2/ Evaluation of IHS and IHS unpublished computer records.

3/ Ibid.

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1/ The Department of Vocational Education was not able to provide a breakdown of allocations for 1973 for the handicapped funds.

2/ Evaluation of IHS and IHS unpublished computer records.

3/ Ibid.

Conclusion to Disadvantaged and Handicapped

One response of the State of Arizona to these funding patterns might be to argue that since special set-aside programs are allocated on a competitive proposal basis, these districts simply have not submitted acceptable proposals or have submitted no proposals at all. This argument is not acceptable; federal regulations require that programs be made available on the basis of need.

The reliance on the application system by the state clearly works to the advantage of larger and more sophisticated school districts with expertise in the development of proposals. Interviews with administrators of the school districts serving the Navajo reservation report that they do not apply for these funds because of their lack of success in the past rather than their lack of interest. To put the onus for not receiving these funds on the local school districts denies the responsibility of the state to provide technical assistance to the school districts, and the obligation of the state to use its authority in a fair and reasonable manner in awarding these special set-aside funds. Once again, the need for an affirmative state policy toward the development of a vocational education system at Navajo becomes apparent.

3. State and Local District Relations

In the State of Arizona's vocational education system, responsibility for the preparation of program plans and proposals rests primarily with the local school districts. The local districts receive assistance and support from a County Coordinator, whose salary is jointly financed by the state and the local school districts.

According to the State Plan, by January of each year the local school districts are required to submit to the state a Plan of Vocational Education. The plan must include: 1/

- Vocational programs, services, and activities to meet the needs.
- Objectives of programs and provisions for evaluation.
- Estimated costs of programs, services, and activities.
- Population groups to be served in the geographic service area.
- Manpower needs and job opportunities.
- Special programs planned.
- Evidence of consultation with local business committees and others, including CETA Advisory Councils.
- Statements of unusual circumstances or situations affecting the local plan for proposed programs, services, and activities.

This plan is designed to provide a basis for the transfer of entitlement funds to the local school district. However, a review by BOAE of Arizona's allocation procedures states "A comprehensive local plan is not prepared." 2/

If a school district wishes to secure money from any of the discretionary categories, it must develop a separate proposal in each category. Thus, a school system seeking money from the categories which include disadvantaged, handicapped, exemplary, consumer and homemaking education, cooperative vocational education, work study programs, as well as the new programs category, must submit a separate application for each program defining specifically the need for the program, goals, objectives, specific skills to be learned, and the program budget. The combination of several applications reflects a school district's program and this appears to substitute the submission of an overall plan. 3/

1/ Arizona State Plan, 1975 - 1976, p. I-46.

2/ Report of Special Review of Vocational Education Fund Allocation Procedures in Arizona, BOAE, June 20, 1975.

3/ Ibid.

The following sections of this chapter examine the working relationships between the state and the local education agencies in vocational education and describe local school district planning and decision-making.

a) The County Coordinator System

From the point of view of State Department of Vocational Education officials, vocational education is a local program, with the responsibility for developing plans and applications for discretionary programs resting with the local school districts. Recognizing a need to have effective communications between the state and the local school districts, however, the state has created a system of County Coordinators to serve as liaison. Additionally, the state recognizes it "is not economically feasible for local educational agencies located outside of the metropolitan centers of the state to employ local directors of vocational education. Yet a need exists for the part-time services of such a person." 1/

There are two County Coordinators in the three counties in which the Navajo reservation is located. One Coordinator serves both Apache and Navajo counties; another serves Coconino County. The Coordinators are financed 25% by the local school districts and 75% by the state. An additional $20 fee is charged each school district for membership in the system. A portion of the state share of the Coordinator's salary is funded through the Arizona Career Education Program; the Coordinator spends half time as the Director of that program. Therefore, he is available for general vocational education planning, program development, monitoring, evaluation, or similar activities on behalf of local school districts only part-time.

In our interview with the County Coordinator for Apache/Navajo County, he indicated that his prime responsibility is to work with the school districts on applications for discretionary program funds. He feels that he has been very successful in getting programs funded in his districts, particularly in the New Programs category. As our analysis of New Programs indicated, however, this success was achieved more to the benefit of the off-reservation than on-reservation school districts. The County Coordinator also assists the school districts in determining their vocational education enrollment, writing final reports, monitoring programs, and certifying teachers; he provides in-service training and research support as needed.

There is a wide variance of opinion as to the effectiveness of the County Coordinator system in the three northern counties. At the state level, the system is viewed as one of the best operational changes ever made, since it provides an ongoing mechanism for communication between the states and the local districts. At the local district level the views differ. The Window Rock School District, for example, withdrew from the County Coordinator system because it felt it was not receiving sufficient service to justify its participation and could better represent its own interests to the state. Another school district is unable to determine exactly what services it is receiving and feels that the County Coordinator is torn in so many directions that the school district doesn't see enough of the Coordinator unless they "holler."

1/ State of Arizona Department of Vocational Education Memorandum, "Field Staffing for Vocational Education."

A similar concern was expressed about the viability of the County Coordinator's role by a third school district in Apache and Navajo counties. When one considers these comments in light of the work load of the County Coordinator, the picture of an extremely overcommitted individual emerges. Even if the County Coordinator were working full-time on vocational education activities, it would be difficult to adequately serve eleven school districts spread over two very rural counties. When one considers that the present coordinator must spend half time as the Director of the Career Education program, the near impossibility of his performing both tasks well becomes clear. It should be noted that the state is not totally unaware of the problem. The State Plan indicates that there is a need to consider additional coordinator services in the northern counties.

A suggestion was made by the County Coordinator for Apache and Navajo counties that the Navajo reservation be served by its own vocational education coordinator. One reason that this approach was not implemented was that the County Coordinator system appears to be working well in Coconino County. The Tuba City School District was unwilling to give up its membership in the Coconino County System to enter a reservation-wide field service district because they were concerned about becoming involved in the problems they perceived in Navajo and Apache school districts, and they desired to maintain the long time cooperative working relationship they had with other school districts in Coconino County.

An additional source of friction results from the fact that the Apache/Navajo Coordinator, who meets monthly with state vocational education personnel in Phoenix, represents school districts both on and off the reservation--school districts that have heavy Indian enrollment and districts that have practically no Indian enrollment. These school districts have very different ideas of what they would like their vocational education programs to be, and different expectations of the way the state should respond to their needs.

Our analysis of the on-reservation districts indicates that there is a need for special assistance in the form of a full-time coordinator. We do not believe that this assistance should be provided by breaking up a system that is operating effectively. The greatest need is clearly in Apache and Navajo counties where assistance is particularly needed to prepare proposals for discretionary program funds. We recommend that consideration be given to creating a reservation district in which the coordinator would have full responsibility for the reservation districts in Navajo and Apache counties, and have a more limited responsibility for reservation school districts in Coconino County that would focus on coordination of the vocational education programs in Coconino's reservation districts with the programs serving the remainder of the reservation.

b) Problems in the Application Preparation and Review Process

The state system for distributing federal and state vocational education funds relies heavily on local school districts application for discretionary grant funds. There was a general consensus among the districts interviwed, which is borne out by the data, that these districts have not received a fair

share of funds for the most important special programs categories--handicapped, disadvantaged, and new programs. According to the County Coordinator, one of the reasons for this problem was that the districts have difficulty preparing good proposals; this problem is attributed in part to a high turnover in personnel at the reservation school districts.

The Window Rock District expressed the feeling that even though proposals are submitted and the school district has high priority according to state plan criteria, it has not received funds for all the programs it deserves. Other personnel from the reservation school districts indicated that they unsuccessfully applied for handicapped/disadvantaged funds many times in the past, and eventually gave up submitting proposals. None of the school districts had pursued an appeals procedure to determine the reasons for having their proposals denied; however, one school district official who felt his school met priority criteria indicated that if his proposal was turned down for the coming school year, he intended to appeal to the State Department of Vocational Education. The Tuba City District indicated the paper work associated with some of the discretionary programs is so extensive in comparison to the limited funds available that it discourages their pursuit of the funds.

Reservation school districts registered concern that the state viewed the districts as not being able to effectively manage funds and operate programs and that this view influenced state funding decisions. Based on our interviews at the state level, it appears that the concern of the local school districts is not unwarranted. We would note that this perception on the part of the school district is yet another reflection of the continuing conflict between the State Department of Education and public school districts serving the Navajo reservation.

The fact that these school districts do not receive their fair share of funds from the discretionary programs, and the issues and questions discussed here indicate the need for a review and revamping of the application development and review process in the Navajo districts.

c) Local School District Planning and Decision-Making

The planning process for vocational education courses in the local school district is by no means a sophisticated or analytical one. In general, one finds that the process depends largely upon the character and attitude of the individual who is responsible for the vocational education program. The schools have little or no labor market information related to the reservation on which to plan courses--an omission that the Tribe, the counties, and the state all agree must be remedied. The result in some instances is an overemphasis on some occupational programs and insufficient attention to others. (For example, the Navajo Irrigation Project seems to have generated substantial focus on vocational agriculture; yet the amount of training occurring in the area appears to far exceed the potential employment opportunities. See Chapter VII-Enrollment and Labor Market.) School districts as well as the postsecondary institutions expressed the need for more data on the jobs which will emerge on the reservation as a result of industrial and natural resources development. It is essential that the manpower projections now

being prepared by the Tribe's Office of Program Development reflecting job classifications that are and will be in demand, be made easily accessible to anyone interested.

Equally important is the dissemination of data concerning jobs on and off the reservation that are now being held by non-Navajos. On and off the reservation Whites are occupying jobs that could be filled by Navajos, were they trained for the positions. Until such information is developed and made available to school districts which have been planning in the dark in the past, the school districts will have little basis on which to evaluate the relevancy of their programs. A preliminary analysis of the relevancy of course offerings to labor market conditions is contained in Chapter VII.

Local advisory councils for vocational education which are mandated by the federal law are used to varying degrees by different school districts. Sometimes, existing committees created for other special programs function as vocational education committees as well. In one district it was reported by the vocational education director that he did not solicit input from advisory council members because he felt they did not have sufficient technical knowledge to contribute to the decision-making. In another school district, the advisory council felt that the school itself should plan and make decisions because school personnel know better what the needs are. None of the interviews with local school district personnel indicated that they had any on-going relationship with NDOE. School districts did, however, express interest in the development of such a relationship. In each of the local school districts, Navajos were reasonably well represented on the advisory councils. Certainly, the Navajo members of the school district vocational education advisory councils offer an initial avenue for NDOE to impact vocational education decision-making at the local level.

The person responsible for planning vocational education courses varies among the school districts. The superintendent generally participates in the county-wide administrator's group that meets monthly with the County Coordinator, but the superintendent is usually not the person responsible for the planning and development of proposals for vocational education. This responsibility may rest with the federal projects coordinator, the vocational education teachers, or be shared between the two. In one district, there is a full-time vocational education director who has no teaching responsibilities.

The lack of coordinated vocational education planning among the administrators and teachers responsible for vocational education has often resulted in situations where the information necessary for proposal development does not reach the person responsible for writing the proposal. The person developing the proposals is rarely the same person who attends the monthly administrator's meeting, and it may be some time before the person responsible for proposals receives information regarding what transpired at the meetings. This lack of coordination at the local level is undoubtedly one reason why the districts have not secured their share of funds. The problem has been compounded by the extremely high turnover among administrators and teachers in the reservation school districts. One can expect that a person who is new to a position involving education programs and planning would require time to obtain knowledge of what is not a simple system.

Given the relative lack of success of these school districts in securing discretionary funds from the state for vocational education programs, it is clear that staff at NDOE is needed to assist the Navajo school districts to improve their planning and proposal development activities.

d) Program Management at the Local Level

A range of problems was brought to our attention during the course of the study by the State Department of Vocational Education concerning the management of vocational education programs in the reservation school districts. It is not the intention of this report to analyze the quality of the vocational education programs being offered (qualitative review of programs would require a different study design than that pursued here, and more resources); however, to the extent that underfunding may be based on reasons of mismanagement, problems of fiscal and program management are not irrelevant.

Without a doubt, there are problems in the reservation school districts. Many of these problems are not unexpected given the fact that the schools are chronically underfunded. Many districts also reported difficulties in securing and retaining general and vocational education personnel with technical and management expertise. 1/ Mismanagement, to whatever degree is not justified. It is the responsibility of the State Department of Vocational Education, on the other hand, to make a positive effort to assist the local districts.

If there is concern that programs may not be managed well, the State of Arizona should provide technical assistance and support, monitor the programs more closely, evaluate the effectiveness of the programs and offer more in-service training. Then schools would be more likely to improve their efforts to provide quality vocational education. Under the terms of the Vocational Education Act of 1963, there is a clear responsibility lodged with the state to assure that everyone in the state has access to quality vocational education:

> Sec. 101. It is the purpose of this title to authorize Federal grants to States to assist them to maintain, extend, and improve existing programs of vocational education, to develop new program of vocational education, and to provide part-time employment for youths who need the earnings from such employment to continue their vocational training on a full-time basis, so that persons of all ages in all communities of the State...will have ready access to vocational training or retraining which is of high quality, which is realistic in the light of actual or anticipated opportunities for gainful employment, and which is suited to their needs, interests, and ability to benefit from such training. 2/

1/ Recognizing this problem, the Navajo Division of Education has been investing substantial resources in the past decade to train Navajo educators and administrators to work on the reservation. The full benefit of this effort has not yet been achieved. It should also be noted that Tribe's teacher training program is designed primarily for Navajos seeking degrees in elementary education, and does not address vocational education needs.

2/ P.L. 90-576. Title I -- Vocational Education, Sec. 101.

With such a Declaration of Purpose in the Federal law, there can be no question of the state's responsbility to work diligently with the local school districts, regardless of their individual capability to build effective vocational education programs, and to assure that vocational education services are available on an equitable basis throughout the state.

A simultaneous reassessment of vocational education planning and program management by the local school districts themselves is also required if the problems that do exist are to be resolved within existing resource limitations.

Conclusion

The problems which have been identified in this section are many, and their resolution will not be easy. A beginning point would be a recognition on the part of the State of Arizona, the local school districts and the Navajo Tribe, as represented by the Division of Education, that a partnership must be formed to mobilize available resources to improve the secondary level vocational education system.

Improved planning, more effective proposal development, better program management, and recruitment of vocational educators are all issues that must be addressed simultaneously with a thorough review of state resource allocation procedures. These activities must move forward in concert if they are to be most effective. An affirmative state policy toward improving vocational education on the reservation would be an important beginning.

More specifically, we would propose that the state create a Vocational Education Coordinator position for the reservation school districts. We suggest further that the state consider contracting with the Navajo Division of Education to carry out the County Coordinator functions. Such an approach would assure a focus on tribally determined vocational education goals and objectives. Since the school district serving the reservation must contribute toward the salary of the coordinator, their concurrence in such an approach should be secured. The state might also consider funding the coordinator 100% of the time given the extensive need and the limited resources of the local school districts. NDOE itself might provide some funds for the salary. Such a contribution would go far to legitimatize the role of NDOE in vocational education policy and program development on the reservation.

The Reservation Coordinator could also assure that information available from the Tribe concerning employment projections would be made available to local schools and utilized by them. S/he could serve as a link between public secondary schools and those of the BIA (an area discussed in greater detail in Chapter VI), where there is much room for improvement. The Coordinator should also have special resources of the state available to assist with special problems, e.g., in-service training, technical assistance, proposal development, etc. In addition, should vocational education funds become available to NDOE through any source, the Coordinator would also be able to identify specific ways and locations in which these resources could be utilized to assist the public schools.

The role of the Coordinator would have to be viewed as only a beginning, however. One of that individual's responsibilities would be to identify additional technical resources required to improve the quanitity and quality of secondary vocational education in the Arizona segment of the Navajo reservation, and assure that all available resources are allocated to on-reservation districts.

B. New Mexico: Secondary Schools

The State of New Mexico's Vocational Education Plan is no more useful to understanding the problems of vocational education services to the Navajo people than the Arizona Plan. There are no references in the New Mexico Plan to the vocational education needs of the Indian people of New Mexico.

As in Arizona, the public hearing and state advisory council mechanisms offer little opportunity for substantive consideration of the special needs of Indian tribes. New Mexico holds a single hearing each year to review the State Plan. The Plan itself is made available to a wide range of agencies and institutions; however, no Indian tribe, nor any organization or representative of tribes in the state, is listed as a recipient of the plan.

The State Advisory Council for Vocational Education is constituted according to the federal regulations. A member of the Navajo Tribe formerly served on the Council, and he has been replaced by another Indian member. Again, like the Council in Arizona, the New Mexico Council has not addressed itself specifically to Indian needs except for a study several years ago at Laguna Pueblo. Individual members of the committee were aware of special Indian issues and did offer several interesting perceptions in our interview. First, it was indicated that because the BIA boarding schools offer only limited pre-vocational services, Indian students are entering the labor market without adequate training; employers must, therefore, establish more costly training programs than would be required if the BIA offered job-oriented vocational training. (Problems of vocational education in Bureau schools are discussed in-depth in Chapter VI.) One member of the committee noted that as an employer, he has had many Indian employees leave their jobs to return to the reservation; Indians are trained in Albuquerque and then return home. Although apparently well-informed, the Council had not addressed itself at all to the problems that surfaced during the discussion.

The State Plan offers a unique view of the less than perfect relationship between the Advisory Council and the Division of Vocational Education through the presentation of specific recommendations of the Council and the responses of the Division. In general, the responses of the state can best be described as "bureaucratic" in nature, failing to deal with the substantive issues raised by the Council. Though not specifically addressed to Indian needs, two of the recommendations and responses cited below are relevant and provide telling examples of council/state interaction: 1/

1/ New Mexico, State of, New Mexico State Plan for Vocational Education, 1971-1972.

RECOMMENDATIONS AND RESPONSES

TO

ANNUAL EVALUATION PREPARED BY THE
"NEW MEXICO ADVISORY COUNCIL FOR VOCATIONAL EDUCATION"

1. General Recommendations:

(A) That a thorough Statewide analysis of vocational education programs be undertaken to determine which programs should be emphasized in order to meet the State's manpower needs while at the same time determine which programs should be de-emphasized in order to avoid saturation of certain occupation markets.

RESPONSE: THE DIVISION OF VOCATIONAL-TECHNICAL EDUCATION (DIVISION) UTILIZES THE SERVICES OF ESTABLISHED AGENCIES SUCH AS THE NEW MEXICO DEPARTMENT OF DEVELOPMENT, EMPLOYMENT SECURITY COMMISSION OF NEW MEXICO, AND THE CHAMBERS OF COMMERCE TO DETERMINE EMPLOYMENT NEEDS THROUGHOUT THE STATE. THE PROJECT PROPOSAL REVIEW COMMITTEE OF THE DIVISION RECOMMENDS FUNDING OF PROJECTS BASED ON STATE MANPOWER NEEDS AND ECONOMICALLY DEPRESSED AREAS WHERE POTENTIAL JOB OPPORTUNITIES ARE IDENTIFIED BY JOB FORECASTERS.

(B) That provisions be made to effect programs in rural areas where a market need is identified, i.e., training technician level personnel in health education outside of campus areas.

RESPONSE: THE DIVISION IS ACTIVELY WORKING TO EMPHASIZE PROGRAMS ASSOCIATED WITH INDUSTRIAL ACTIVITY LOCATING OR RELOCATING IN VARIOUS PARTS OF THE STATE. IN ADDITION, THE DIVISION HAS MEMBERSHIP IN THE NEWLY APPOINTED EXECUTIVE COMMITTEE ON STATEWIDE HEALTH MANPOWER TO DETERMINE WHAT NEEDS THE MEDICAL PROFESSION HAS STATEWIDE. VOCATIONAL NURSING PROGRAMS ARE BEING DEVELOPED IN COOPERATION WITH HEALTH INSTITUTIONS IN THE FOUR CORNERS AREA AND OTHER AREAS OF THE STATE.

With regard to the first recommendation, our discussion will reveal that the data being utilized by the Division of Vocational Education have little relevance to the real needs of the Navajo Tribe. Insofar as the creation of programs to meet special needs in rural areas is concerned, one of the basic problems identified in our interviews at the state and local level was the lack of funds with which to create new programs.

In conclusion, we would make similar recommendations concerning the New Mexico State Plan that we made to Arizona. An affirmative policy toward vocational education for Indians should be articulated in the State Plan, and specific goals and objectives established for vocational education services to Indians.

1. Secondary Schools Allocation: New Mexico

To understand New Mexico's formula for allocating federal vocational education funds, one must first examine how the system worked prior to the implementation of the State Equalization Guarantee Formula in 1974-75, and how it operates now that the equalization law has been implemented.

a. Prior to the Equalization Formula

According to a GAO letter report dated March 2, 1976, New Mexico's system for allocating vocational education funds was not consistent with federal regulations:

> Federal funds made available under Part B of the Vocational Education Act of 1963 were not allocated according to the criteria in the approved State Plans. Instead, the State allocated funds to secondary schools at a flat rate of $3,500 for each vocational education curriculum offered during fiscal years 1970 through 1974. The State Vocational Education Division established this flat rate in 1970 by dividing the total number of program proposals submitted by secondary schools into the previous year's total allocation to these schools. In fiscal year 1975 the State allocated secondary schools about $93 per . . . . . full-time equivalent student. 1/

For the districts serving the Navajo reservation, this formula probably resulted in their receiving less than their fair share of vocational education funds over the five year period. While no hard data are available, a logical analysis of the flat rate funding leads one to the conclusion that these poorer districts were disadvantaged by this allocation system.

1/ U.S. General Accounting Office, Manpower and Welfare Division. Letter and report from Edward T. Jennings to the Secretary of Health, Education and Welfare, dated March 12, 1976 re Survey of Certain Financial Transactions Involving the Use of Federal Funds by the New Mexico State Department of Education. (Information released as part of the memorandum from HEW Audit Agency to Director of Management Systems and Analysis Division, Office of Education, March 16, 1976).

The number of students enrolled in vocational education courses is a product of the number of courses offered, which in turn is a product of vocational expenditures. Vocational expenditures are a product of the tax base of the local school districts and the funds available from the state and federal government to pay for the courses. Therefore, the number of vocational students and programs is affected not only by whether the local school district is able to produce local funds, but also whether the school districts have received adequate funding from state and federal sources. In the school districts serving the Navajo reservation, which are among the poorest in the state and have limited local financial resources, the flat rate allocation system for federal and state funds can only hurt. Rich districts with more local resources, more programs and more students are necessarily benefitted. Personnel from the State of New Mexico did not challenge this analysis when it was presented to them.

The apparent result of the five years of flat rate funding was that the Navajo school districts entered the state equalization period with a lag in federal and state vocational education funding and inadequate vocational education programs. Given these circumstances, particularly the illegality of the state allocation method, we strongly argue that the state should be required to make-up the financial resources denied those districts in the past. The new state equalization formula does not do this; it does not address any past inequity in the state system for allocating vocational education funds.

b. State Funding Under the Equalization Formula

Under the present equalization system, the state takes credit for federal vocational education funds in determining the amount of state funds which it will provide to a school district. The formula works in the following way: 1/

1) The state determines what the total budget of the school district should be using a series of weighted program units. The total number of program units is multiplied by a specific number of dollars per unit to yield the total school budget (X).

2) To determine what the state equalization payment should be, the state:

a) adds together:

(1) the uniform mill levy

(2) the motor vehicle fees

(3) 95% of federal funds available to the district from a) forest reserve; b) regular vocational; and c) P.L. 874.

(1) + (2) + (3) = (Y)

1/ New Mexico, Dept. of Finance and Administration, Public School Finance Div., Instructions for Budget Preparation 1976-77, Santa Fe, N.M., March 8, 1976.

b) The state subtracts Y from X (the total budget for each LEA)

c) The balance is the state equalization guarantee for the LEA

In our view, this procedure simply substitutes the state equalization formula for the federal vocational education criteria in distributing federal vocational education dollars. The issue is not so much whether vocational education is a categorical program which requires that funds be spent in a particular way. There is little doubt that the federal vocational education monies included in equalization are spent on vocational education since state and local education agencies far outspend the federal government in vocational education. The issue is whether the Bureau of Occupational and Adult Education believes that the equalization formula meets the federal criteria. Ironically, the State of New Mexico does not argue that they are meeting the federal criteria. The state merely makes a pro forma allocation of federal funds to each local district, based largely on historical experience. They argue that the federal regulations do not prohibit what they are doing; we disagree.

Let us be perfectly clear; this report is not taking issue with equalization. In the long run, though there may be some problems, the equalization formula can only work to the benefit of school districts with large numbers of Indian children. The question really is whether the federal government should allow the State of New Mexico or other states for that matter, to consider federal funds allocated for a specific purpose as though they were state funds, not constrained by federal regulations. Our position is that the vocational education legislation prohibits such action on the part of the state and therefore BOAE should not allow it.

The issue then becomes, what should be the use of federal vocational education dollars in a state that equalizes, particularly one in which the state had misallocated funds in the past. Our proposal fits with preliminary plans of the State of New Mexico, as well as with the recommendation of the General Accounting Office Report, that federal monies be used to offer incentives to school districts to create new and more relevant vocational education programs. Discussions have been held between the New Mexico Director of Vocational Education and the State Division of School Finance which administers the equalization program, concerning removal of federal vocational monies from the equalization formula. Once removed, federal vocational education monies would be allocated in part to postsecondary programs, and in part to secondary schools for capital outlays to purchase equipment for new courses. We are in strong agreement with this approach, assuming, of course, that in providing funds to local school districts the State takes into consideration the criteria of the federal regulations and makes up for the inequity of its past funding procedures. Federal funds would then be achieving a stated federal policy objective: assuring that the vocational education programs respond to changing labor market demands rather than continuing to provide training in occupations for which there is no longer a demand.

The federal position in this instance should be to encourage the state to implement the plan which it has under consideration by taking action to (1) disallow the inclusion of federal vocational education funds in the equalization formula on the grounds that the equalization formula is inconsistent with federal requirements, and (2) require that the state allocate federal funds to secondary schools for new programs in a manner consistent with the regulations and makes up for past inequities. Such a course of action is within the authority of the Office of Education and would go a long way toward making up for the losses in vocational education services on the Navajo reservation as a result of prior state funding policies.

2. Funding of Disadvantaged and Handicapped Set-Asides

Prior to equalization, New Mexico claimed that all of its population was disadvantaged and, therefore, it made no special provision to serve disadvantaged students under the 15% set-aside. Although the state is indeed poor, one cannot argue that there are no differences among population groups.

As Table III-17 shows, per capita income and percent of persons in poverty vary widely across the state. There are areas that have much larger disadvantaged populations than others and New Mexico makes no effort to deal with those areas of greater poverty.

Table III-17

Per Capita Income of Selected New Mexico Counties

Counties with Navajo Population	Per Capita Income	% Persons in Poverty
McKinley	$1717	33.7
Rio Arriba	$1520	34.3
Sandoval	$1557	37.5
San Juan	$2200	21.7
Bernalillo (Albuquerque)	$2872	13.0
New Mexico (State)	$2449	18.5

Source: U.S. Census, 1970.

Under equalization, the state argues that to provide additional funds for disadvantaged for local school districts would not be consistent with the equalization formula.

The state has used handicapped set-aside funds in state institutions only. As we have discussed in the Section on Handicapped in the State of Arizona, this in no way addresses the problem of the exceptionally large number of handicapped Navajo children nor the intent of the vocational education law and regulations to provide vocational education services to handicapped children in regular public school settings.

1/ U.S. Census, 1970.

Ignoring these disadvantaged and handicapped issues is not responsive to the needs of Navajo children nor to federal regulations.

As was stated by the BOAE attorney-advisor in reference to disadvantaged and handicapped funding, "to allow these funds to be used in programs outside of vocational education would unquestionally subvert the letter and spirit of the legislation." 1/

The State of New Mexico must be required to fund handicapped and disadvantaged programs so that school children in the legislatively mandated target populations receive the services to which they are entitled.

3. State/Local School District Relationships

New Mexico's equalization formula results in a vocational education decision-making system which is almost 100% locally controlled. Once the state has made its allocation of funds, the district can determine for itself what vocational education programs it wishes to operate. Therefore, in order for vocational education to receive a high priority, the vocational education director of a school must in effect 'sell' the program to decision-makers in the school district.

In order to satisfy federal requirements, the local school must complete a vocational education plan and submit it to the state. Although the State Plan indicates that the local plans are to be developed on an annual basis, this is rarely the case. Because there is very little change in the nature of any school's program, the state viewed it as a waste of time and energy to have plans resubmitted each year. Plans are actually submitted about every three years. When they are developed, they are not rigorously reviewed at the state level, and are, at best, merely pro forma reports designed to provide some documentation of the basis on which federal funds have been distributed.

When a school district does not submit a new plan, the state, as we were informed, simply re-examines the old plan and on that basis determines the district's funding priorities. This entire review process is largely irrelevant since, as we noted above, the state takes credit for any federal funds which are provided. The planning process at the state and local level is, in effect, non-existent.

The State Department of Vocational Education is planning to develop standards and criteria for the assessment of local programs. Presently, there is an informal assessment process which by statute is supposed to occur every three years, but which actually occurs every five years.

1/ Brustein, Memo, Office of General Counsel, DHEW, September 4, 1975.

If schools want to receive vocational education funds through the state, the only program requirement with which they have to comply is to offer a minimum number of vocational education courses, and the requirements are indeed minimal. The number of courses which a school must offer depends on the size of the school. The state defines vocational education programs in terms of occupational proficiency service areas. The service areas correspond to the major occupational categories, e.g., agriculture, distributive education, office education, home economics, trades and industry.

The minimum requirements based on school enrollment are:

High School Enrollment	School Should Offer Minimum of
1 - 200	1 program in each of 2 service areas
201 - 500	1 program in each of 3 service areas
501 - 1,000	1 program in each of 4 service areas
1,000 - and above	5 programs in any of 4 service areas 1/

Once a local school district has met these minimal standards, it need not have any additional courses approved by the state. When approval is sought, it is viewed as a mere formality, with the state often not formally denying or approving a particular application. In fact, it appears that some local schools consciously avoid seeking course approval from the state because they feel they are harrassed by having to comply with certain state requirements when they do so and receive no benefits when courses are approved.

The lack of a systematic planning, monitoring and evaluation process seems to be a glaring omission in the New Mexico secondary school vocational education system. Coordination among the school districts or between secondary and postsecondary schools is extremely limited. Contact with the BIA is nonexistent. Although there has been some effort to avoid duplication of course offerings among high schools, there is no operational mechanism to enable students to participate in courses offered in neighboring schools.

One of the major problems insofar as the equalization formula's impact on vocational education is concerned is that no funds are made available specifically for new programs. Therefore, unlike the Arizona situation where a major proportion of the funds have been set aside for new programs, in New Mexico, if a new program is desired, the only alternative for a vocational education director is to seek funds from the local district. The present system encourages the maintenance of the same vocational education programs from year to year, an aspect of vocational education which has been severely criticized across the country. The lack of adequate planning only further exacerbates the situation. This situation makes the proposal to have the state spend a portion of federal vocational education monies on capital outlays for new programs even more important.

1/ New Mexico, Minimum Educational Standards for New Mexico Schools, Santa Fe, NM: New Mexico State Dept. of Education, De-ember 1974, p. 24.

The picture of decision-making which emerges is one in which the state exercises little, if any, quality control over the activities of the local education agencies with regard to vocational education. There is little monitoring or evaluation of the local programs to see if they can be improved and no mechanism to assure the relevance of the programs to changing labor market conditions. The result is a very weak system of secondary school vocational education. This conclusion was also reached by the Governor's Council of Economic Advisors: "Vocational preparation in high schools was found to be ineffective in placing students in jobs for which they were trained or in raising their occupational levels compared to students who had not taken vocational program since high school." 1/ The report goes on to recommend that because of the failure of vocational education at the secondary school level, "career education should be stressed in public schools, specific training should be de-emphasized and left to postsecondary institutions." 2/ This recommendation will be analyzed in-depth in Chapter VIII in terms of its implications for Navajo. Suffice it to say at this point, that the failure of secondary school vocational education should not necessarily result in a decision to diminish the scope of training offered at the secondary level, but rather, should indicate the need to improve the quality of training. This is especially true in light of the inadequacies of the vocational education planning, development, operations and evaluation system at the secondary level which has been in effect in New Mexico.

1/ New Mexico, A Report to the Governor's Council of Economic Advisors, State of New Mexico, from the Committee on Educational and Training needs for Economic Improvement. December 19, 1975.

2/ Ibid.

C. Special Funds for Vocational Education

In addition to basic funding for vocational education under Part B of the Vocational Edudcation Act, local school districts and BIA high schools have three special programs available which could be used to help support vocational education: Title IV, Part A of the Indian Education Act; Title I of the Elementary and Secondary Education Act; Johnson O'Malley Supplemental Fund (JOM).

The regulations for these programs do not preclude the support of supplementary vocational education programs; rather they are designed to assure that the local school districts and the state do not diminish their contribution for vocational education because a school district has decided to support a special vocational education program using these funds. For example, if a school district has been spending $100,000 per year for vocational education and desires to add another course which would meet the needs of its educationally disadvantaged students, it could do so as long as it did not reduce the $100,000 basic funding. More specifically, the school district could not reduce its vocational education expenditures by $20,000 and subsitute Title I funds. But if a local school district wants to add a new vocational educational program to train Navajo students in particular demand occupation, but does not have local, state or federal vocational education funds to cover the costs of the program, the Title I funds could be used to cover these costs.

The argument that these special funds should not be used for vocational education because there are other basic funding sources for such programs cannot be accepted in light of the limited amount of funds available for vocational education through Part B of the Vocational Education Act. Local school districts want and need additional revenues to operate expanded and improved vocational education programs. There are real limits on the amount of local revenue which can be generated by public school districts serving the reservation. Furthermore, there are limits to the funds that are likely to be made available from the federal and state government. Where a school district is operating a vocational education program, and that program is inadequate to meet the vocational education needs of disadvantaged students, then the use of Title I, Title IV or JOM to support special vocational education programs is a very purposeful use of these funds, and contributes significantly to improving the educational opportunities of Indian children. This option should be carefully considered by NDOE and local Parent Advisory Committees where they exercise control or influence over the expenditure of these special funds.

1. Title IV Part A Indian Education Act

The Title IV regulations require that a Parent Committee, made up of parents of students in the schools to be served, first determine the needs of their children and schools, priorities those needs, and then determine

the kind of program that should be supported by Title IV money. There is one Parent Committee for the school district, and the Committee decides on programs for both the elementary and secondary schools. If the Parent Committee determines that vocational education and training is a need not being met by the existing vocational education program at their school, they could appropriately and legally design a project to expand the existing vocational education program to meet the special needs of their children.

Under Title IV, Part A, the regulations require, "A formal mechanism for approval by a majority of the Committee voting in open session of the application and of projects and activities to be implemented by the applicant which affect the community served." 1/ In the case of Title IV, then, the school district cannot act without the community.

The response of officials in the Title IV office in Washington to the prospect of utilizing Title IV monies for such purposes was extremely negative. Their attitude and preference is for Title IV to be used for bilingual and bicultural programs. This attitude surely has an effect on the federal program coordinators in local school districts with whom they work directly, and therefore, indirectly on the Parent Committees. A summary of the Title IV Part A grants for 1975-76 shows that the reservation school districts with high schools received $1,216,115.35 for Indian students. The main emphasis of these programs is on communication and language skills and bilingual/bicultural projects with no funds being expended for vocational education. (See Table III-19.) Since Title IV Part A monies are not being used in any case by Navajo reservation school districts to support secondary school vocational education programs, we can only presume that the Parent Committees are not aware and are not being informed that this is a legitimate use of Title IV monies. 2/

1/ 45 CFR 186 Indian Elementary and Secondary School Assistance Act Sec. 186.17(f).

2/ Of special note with regard to Title IV is the fact that the school districts of Winslow and Holbrook in Arizona and Aztec in New Mexico are currently not applying for Title IV Part A funds, although all three school districts have significant Indian enrollment. As was described earlier in this section, it is the decision of the Parent Committee and not the School Board, as to how Title IV money will be utilized. The School Board does not have the authority to approve or veto the use of those funds. Officials in one school district not receiving Title IV money explained in an interview that their district had not applied for Title IV money because "the School Board was not going to be told what to do" by a Parent Committee over which it had no control. Consequently, the Indian students in that school district are not receiving funds that are explicitly designed to meet their special needs. This issue should certainly be investigated by the Office of Indian Education.

Table III-18

Title IV Part A--Grants in Progress at Secondary Schools

School District	Grant Title	Amount
Kirtland Central	Dine Cultural Curriculum and Communicative Education Project	$278,150.00
Cuba	Integrated Curriculum for Navajo Children Incorporating a Para-Professional Internship Program	34,611.32
Bloomfield	Special Project to Increase the Performance of Indian Students	44,225.58
Farmington	Oral Language Growth Through Cultural Enrichment with Supportive Services	43,442.42
Dulce	Teacher Aide Program and Instructional In-Service Program	34,911.77
Window Rock	Improving Communication Skills	171,803.85
Page High	Bilingual/Bicultural Student Counselor	8,229.36
Ganado	Bicultural Communication	94,764.32
Tuba City High	Indian Home-School Cultural Curriculum Project	63,049.60
Kayenta Elementary and High	Family Guidance Project	101,284.51
Chinle	Navajo Language, Culture and Community Based Education Projects	251,775.31
San Juan, Utah		89,867.31
Total		$1,216,115.35

(Note: There are additional Part A Grants to Elementary Schools.)

Source: Title IV, Part A, Office of Indian Education, Washington, D.C.

2. Title I Elementary and Secondary Education Act

Funds made available to local education agencies may be used for projects which according to Section 116.17 of the Title I regulations:

> shall have been designed specifically to meet special educational needs of those educationally deprived children. 1/

This definition would clearly include vocational education projects. A total of $4,239, 155 in Title I funds was available to Arizona and New Mexico reservation school districts. 2/ An examination of the programs which were supported with these funds (see Table III-20 and Table III-21) shows that the major emphasis was on math, kindergarten, and reading and language development programs. Even though there are high schools in these districts, it is apparent that these school districts, as is the trend nationally, utilize Title I money for programs at the elementary school level although it can appropriately and legally be used at the secondary level (Elementary and Secondary Education Act).

Title I requires that parents be consulted and involved in project planning and have continuing involvement in the development and operation of each project. While the regulations also set certain standards by which the adequacy of the parent involvement will be judged, they do not provide the Committee with decision-making authority as does Title IV. Since Title I funds are in no case supporting vocational education programs in the reservation school districts, the Parent Committees are apparently unaware of their option to do so.

1/ Title I regulations, Section 116.17.
2/ Arizona, Dept. of Education, Title I, ESEA and New Mexico, Dept. of Education, Title I, ESEA.

Table III-19

FY 76 Program Titles of Title I Programs

in Reservation School Districts in Arizona

Chinle - Improving Reading, Language and Curriculum

Ganado - Operation Reading/Math

Window Rock - Bilingual Instructional Aides

Page El and High - Reading Abilities Development

Tuba City Unif. - Reading in English, Our Second Language/Math Skills

Kayenta - Reinforcement of Basic Reading and Language Arts Skills for Students

Source: Arizona State Dept. of Education.

Table III-20

FY 76 Title I Programs in Reservation School District

in New Mexico

Kinds of Programs	# of Reservation School Districts Using Title I Funds for Programs
Kindergarten	4
Reading	4
Language Level	3
Parent Advisory Comm.	3
Math	5
Fine Arts	1
Summer	2
Tutorial	1
Bilingual	1
Follow Through	1

Source: New Mexico State Dept. of Education.

3. Johnson-O'Malley Act

The Johnson-O'Malley Act provides funds for supplemental financial support to public school districts to meet the special and unique educational needs of eligible Indian students.

The BIA may contract JOM funds to a tribal organization or an Indian corporation authorized by resolution of the tribal governing body, or to state or local school districts where the tribal governing body does not authorize a tribal organization to contract for the program. For the coming year, the Navajo Division of Education has contracted with the BIA for the administration of JOM programs in the school districts on and near the reservation in Arizona, New Mexico and Utah. NDOE, in turn, will subcontract with the school districts for the operation of the JOM programs. Previously, the JOM programs were operated under contract between the Bureau of Indian Affairs and Arizona, New Mexico, and Utah Departments of Education which were responsible for allocating funds to local education agencies.

Table III-22 shows the reservation school districts and the amount of their JOM contracts for school year 1975-76. In addition to the contracts with the school districts, the Table shows the amount of the contracts for the peripheral dormitories which Navajo students live in while attending public schools.

Under this new arrangement, the tribe through NDOE and the local JOM Parent Committees can control the use of these funds by local school districts.

The Kayenta School District was the only district during 1975-76 to utilize JOM funds to support a vocational education program. Part of their JOM funds was used to support a Highway Fleets Class that provided training in the use of heavy equipment. Some of the other programs that were supported with JOM funds in the other school districts included cultural enrichment, remedial reading, transportation, curriculum materials, parent costs, counselors, health and administration, among others.

Summary

There is a total of approximately $12.0 million dollars available for special education programs under the three funding sources to meet the needs of the Navajo students. $29,500 or 0.2% of these funds are being expended for vocational education. Our analysis is not intended to contest the fact that the programs which are being operated are priority programs which deserve funding. We do believe, however, that given the near absence of funding for vocational education from these programs, and the stated interest of Navajo parents in more vocational education for their children, 1/ that the schools and the parent committees are not giving consideration to the vocational education needs of secondary school students in planning such programs. In light of the desperate need for vocational education funds which this study has revealed, the allocation of at least 10% (and perhaps more) of these funds to vocational education appears warranted. With this level of funding over a period of years the quantity and quality of vocational education in secondary schools could be vastly improved.

To assure that the Parent Committees and schools give proper consideration to vocational education, NDOE should consider a special effort to properly inform them of their options.

1/ See NDOE Hearings.

Table III-21

1975-76 Johnson O'Malley Contract Amounts*

		1975-76
New Mexico:		
1. Bloomfield		$ 111,909
2. Central Consolidated		512,655
3. Cuba		130,762
4. Farmington		105,184
5. Gallup		1,226,565
6. Jemez Mountain		25,000
7. Magdalena		70,031
	Total.....	$2,182,106
Arizona:		
1. Chinle		$1,089,240
2. Ganado		449,915
3. Kayenta		445,320
4. Puerco		84,705
5. Tuba City		687,824
6. Window Rock		745,009
	Total.....	$3,502,013
Utah:		
1. San Juan School District		$ 114,000
2. Utah Nav. Dev. Council		71,000
	Total.....	$ 185,000
Arizona Peripheral Dormitories:		Tutition:
1. Flagstaff		$ 134,149
2. Holbrook		113,486
3. Winslow		63,364
4. Snowflake		35,218
	Total.....	$ 346,217
	5% Admin. Cost	17,310
		363,527
	Ariz. IEC Parental Cost Contract.....	118,525
	Total.....	$ 482,052
New Mexico Dormitory:		
1. Aztec		133,500
Utah Dormitory:		
1. Richfield		$ 165,139
SUMMARY:		
New Mexico		$ 2,182,106
Arizona		3,502,013
Utah		185,000
Arizona Dormitories		482,052
New Mexico Dormitories		133,500
Utah Dormitories		,165,139
	Total.....	6,649,810
Navajo Division of Education		264,356
	Total.....$	6,914,166

*Information provided by NDOE; Arizona Department of Education, Annual Report of the Superintendent of Public Instruction, FY74-75, Phase II; and New Mexico Department of Finance and Administration, Statistics, Public School Finance, FY74-75.

Chapter IV

Postsecondary Education

The Navajo reservation is presently served by five community colleges. The three institutions in Arizona include Northland Pioneer Community College which is part of the State of Arizona's community college system; Navajo Community College (NCC), a private college chartered by the Navajo Tribal Council and supported primarily by the Bureau of Indian Affairs and other federal agencies; and the College of Ganado, a small, private, non-profit church-supported institution. The two community colleges in New Mexico are the Shiprock branch of Navajo Community College and San Juan Campus, a branch college of New Mexico State University. The funding, planning and decision-making processes for each of these institutions is disscussed below.

A. Northland Pioneer Community College

1. Funding

Northland Pioneer Community College, located in Navajo County, is organized in accordance with the provisions of the Arizona Education Code.1/ Northland has its administrative offices in Holbrook, but offers services at scattered sites across the reservation, primarily in Navajo County, but also at a few sites in Apache and Coconino counties. The college is financed mainly by state funds which provide operating funds and by a local tax levy.

The state provides $680 for each of the first 1,000 full-time student equivalents (FTSE), and $440 for each FTSE over 1,000. Additional funds are provided for students participating in vocational education courses; $272 for each of the first 1,000 students, and $176 for each student above 1,000. These funds are available to cover the cost of any student in the state attending a community college which is organized under state law.

The state contribution does not cover the entire cost of maintaining the community college, however. The county or counties which are part of the community college district must provide funds to make up the difference between the state contribution and the actual cost of operating the college. The County Board of Supervisors may either supply funds from specifically designated sources or levy a tax on property.

In addition to the funds for maintaining the college, the state also provides funds for capital outlays including the purchase, erection, remodeling or completion of buildings and purchase of equipment and facilities for educational or auxiliary purposes, but excluding the cost

1/ Arizona Education Code, Chapter 6.1.

of any land granted to the district and dormitories erected for the use of students or faculty members. A one-time payment of 50% of the total cost for capital outlay for any district up to a maximum of $500,000 is provided by the state. Beyond this initial contribution, the state also provides an annual payment of $135 per FTSE to be expended for capital outlays.

Federal Part B vocational education funds are also made available to community colleges across the state through the entitlement formula and on a project by project basis. Postsecondary entitlement funds are allocated using the same formula utilized for secondary schools; the problems with this formula have been discussed previously and need not be repeated here.

The various sources of revenue for Northland Pioneer Community College are summarized below from the budget for the school year 1975-76:

a.	Basic State FTSE	
	1,000 students @$680	$ 680,000
	44 students @$440	19,360
b.	Vocational Education FTSE	
	440 students @$272	119,680
c.	Federal Vocational Education Entitlement Funds	31,900
d.	County Taxes	1,079,500
e.	State Capital Outlays per FTSE	
	1,044 students @$135	140,690
		$2,071,130 1/

Navajo students are not only eligible to attend Northland, but also have the right to attend any other community college in the state. When a student attends a community college outside his county of residence to take an academic program, the county of residence must pay the difference between the state's contribution for the education of the student, and the actual costs for the student incurred by the community college. Payment of these funds must be approved by the County Board of Supervisors of that student's residence prior to a student's enrollment. When the student is participating in a vocational/technical program which is not available at the college in his/her county or if there is no community college serving his/her county, then the State makes up the difference between the State share and actual costs through a special Area Vocational School fund.

1/ Letter from Edwin Sorensen, President, Northland Pioneer Community College, to Rj, dated April 26, 1976.

Therefore, all vocational/technical programs in the entire Arizona community college system are open to Navajo Arizona residents, at no cost to them with the exception of room, board, and living expenses.

2. Northland Vocational/Technical Programs

Northland offers the Associate of Arts, Associate of Science, and Associate of Applied Science Degree in the following occupational areas:

Agriculture-Related	Home Economics	Business
Forest-Related	Child Care	Accounting
Range Management	Home Furnishing and	Secretarial
Animal Science	Interior Decorating	Real Estate
		Mid-Management
		Banking

Health	Technical and Trade	
Dental Assistant	Automotive	Small Appliance
Optometric Lab	Building Construction	Repair
Assistant	Diesel Engines	Welding
Medical Lab	Electronics	
Technician	Manufacturing	

Our analysis of the enrollment at the college indicates that of the 1,129 people taking vocational education classes, at least 20% are Indians. Data were not available to indicate exactly how many Indians were enrolled on a course by course basis. 1/

Northland presently conducts classes in several reservation communities including Kayenta, Window Rock, Ganado, Chinle, Sanders, Shonto and Dilcon. A significant proportion of these courses are Adult Basic Education, particularly in Apache and Coconino counties. Because there is not a public community college located in Apache County, Northland provides limited courses in several communities in that county. However, prior approval of the Apache County Board of Supervisors for each course is required before Northland can enter the County, since the Board must agree to pay the local share for operating the program. The current reapportionment of Apache County will insure more equitable representation of Indians in the northern portion of the county on the Board of Supervisors and may provide an opportunity to shift the nature of Apache County's involvement with Northland.

3. Planning and Decision-Making

The community college postsecondary education system in Arizona is one of the most extensive in the country; in addition to the substantial state funding, there is a great deal of flexibility in developing specific courses. In fact, there are only two criteria which must be fulfilled for a community college to create a new vocational/technical course:

a. At least fifteen students must have expressed a desire for the course.

b. There must be evidence of a labor market need for the program, including assurance of placement of the students following course completion. 2/

1/ Ibid.
2/ Interview with Edwin Sorensen, President, Northland Pioneer Community College

In order to take advantage of the resources at Northland, the tribe itself should take the initiative in identifying job opportunities and request Northland to develop courses so that Navajo people are trained for those jobs. The Capital Outlay FTSE of $135 per student provides the college with additional funds to purchase equipment or secure facilities in which to operate the program, should this be necessary.

Our interview with administrators at Northland indicated that they are willing to respond to requests for programs and courses by the Navajos. To make such a request known, it is the responsibility of the community to organize a steering committee to determine the job opportunities in the desired program area and give guidance to the college as to what courses they would like to have. If the committee can guarantee at least 15 students (in some cases the number of students can be lowered), Northland is willing to provide the requested program.

On the surface, these procedures may not seem difficult. In fact, however, organizing such a steering committee within a reservation community may be a difficult task and, according to Northland staff, it frequently does not occur. In addition, there appears to be a tendency within the community to request Adult Basic Education programs, rather than vocational technical courses which might be made available by Northland in the facilities of one of the public or Bureau high schools on or near the reservation.

The Navajo Division of Education has a critical role to play in offering technical assistance in different communities to facilitate the development of relevant courses. Individual communities on the Navajo reservation should not be expected to identify the education and training needs which the college could fill. The college, in concert with the Division of Education could identify a program which it believes would be responsive to the needs of the community, review that program in the community, and determine whether there is sufficient interest to warrant creation of the course.

One of the other reasons given by Northland Pioneer for not offering more courses in Apache County is its desire not to compete with Navajo Community College. Northland is anxious not to duplicate programs offered by NCC, and to avoid even the appearance that Northland is usurping a role which appropriately belongs to NCC. NCC must clarify its role in relationship to Northland so that the range of vocational/technical courses available on the reservation is as extensive as possible.

It should be noted that the amount of postsecondary vocational education available on reservation is now limited. Northland, with its guarantee of funds from the state could do much to fill the gap. The tribe incurs little or no expense for students attending Northland; if more students participated in Northland's vocational programs, it would expand the pool of vocational education resources available to the entire tribe.

The resources of NCC could then be directed at programs and courses not provided at Northland, and to meet the needs of students who do not have access to Northland programs due to distance barriers.

B. College of Ganado

The College of Ganado currently does not provide vocational/technical education. However, in November of this past year, the Board of Regents accepted a Statement of Purpose that opened the door for developing a vocational training program. The Presbyterian Church, with which the College of Ganado is affiliated, has reserved $180,000 for a vocational/technical facility and program. This money must be matched, and the College of Ganado sees itself moving into a capital funds activity in an effort to raise the $180,000 matching funds. 1/

No further information concerning the college's approach to the development effort was available at the time of our field interviews. It would appear, however, that a mutually beneficial relationship could be developed between Ganado and NDOE in the development of a vocational/technical education program.

C. San Juan Campus, New Mexico State University

San Juan Campus is funded from four different sources:

1. Local Tax Levy. A local tax provides funds to the college on the basis of the number of full-time student equivalents; $400 per FTSE is provided.

2. Tuition. Students in vocational/technical courses pay tuition of $150 per semester or $300 per year. (Academic students pay $360 per year.)

3. Federal Vocational Education Funds. Part B federal vocational education funds are allocated to San Juan Community College on a basis of specific courses which the college desires to operate. The difference between the federal funds available and the actual cost of the program is covered from state appropriations. (See #4 below.)

4. State Appropriations. The Commission on Postsecondary Education of the Board of Educational Finance supplements federal monies to enable schools to cover the actual costs of a particular program. Financial aid to cover the costs of students attending San Juan is available from federal, state, local, and tribal sources.

1/Interview with Dr. Thomas Jackson, President, College of Ganado

The following data summarize the available funding for the vocational/technical portion of San Juan Campus:

1975-76

Source of Funds:	
Local Tax	$ 62,800
Tuition	58,400
State Appropriation	123,443
Federal Funds	49,326
	$294,009 1/

The Dean of the Vocational Technical Division indicated that in the past San Juan had applied for disadvantaged vocational education funds, but had never been successful in securing them; as a result they had not continued to apply for those funds. 2/

The San Juan Campus had a total enrollment of 827 students in February 1976; of this total, 19% were Indians.

Vocational enrollment data provided by the college for the fall semester, 1975, show that 435 students were being served in vocational programs and that Indians comprised 17% of that enrollment (74 students). Table IV-1 shows the enrollment of Indians and non-Indians in the specific vocational education programs offered at San Juan. Data from San Juan indicate a high placement rate for students completing the vocational/technical programs.

The decision to develop courses or programs at San Juan is based on three major criteria: 1) a survey of student interest; 2) industrial survey of labor market needs, and 3) job analysis.

Officials at San Juan indicated an interest and desire to work with the tribe and to provide needed programs to the community which it serves. San Juan has had substantial contact with the tribe in an effort to coordinate training, but nothing has materialized. The emergence of the NCC-Shiprock Branch has also created a measure of competition with San Juan, 3/ similar to the problem with Northland in Arizona.

A deterrent to many students who might want to attend San Juan is the absence of dormitories and the difficulty in finding other living arrangements in Farmington.

1/ Letter from Glen Gabeheart, Dean, Vocational-Technical Division, San Juan Campus, N.M.S.U., to Rj Associates, dated March 30, 1976.

2/ Interview with Glen Gabeheart, Dean, Vocational-Technical Division, San Juan Campus, N.M.S.U.

3/ Ibid.

D. The Gallup Branch of the University of New Mexico

The Gallup Branch of the University of New Mexico offers no vocational/technical courses at the present time; however, they do offer an A.A. degree in nursing and physician's assistant. They are attempting to begin a building project using federal funds and possibly a local bond issue to accomodate a vocational program.

As part of that effort, a Community College Master Planning study was conducted for the college by Dr. Richard Tonigan. The study proposes a very much expanded role for the Gallup Branch in the provision of vocational/technical courses. 1/ The study identifies the following three categories of programs:

Present Programs	Programs Under Consideration	Areas for Future Consideration
Associate of Arts Degree:	Associate of Arts Degree:	Vocational-Technical Programs in:
Nursing	Secretarial Office Practices	Construction skills
Physician's Asst.	Recreation	Auto Mechanics
Elementary Education	Technical Business	Sales Management & Retailing
	Hotel Motel Curriculum	Bookkeeping
		Surveying
		Welding
		Medical Technology
		Home Health Asst.
		Other programs which address the fields of: Transportation Electrification, Communication, and Creation of Small Business.

Given its proximity to the reservation, the Gallup Branch represents a potentially important resource for vocational/technical courses for Navajo tribal members. The working relationship between NDOE and Gallup Branch should begin prior to the planning and development of the proposed vocational programs as part of on-going coordination to insure that the tribal needs and priorities for training are included in the Gallup program.

E. Navajo Community College

Chartered by the Navajo Tribe in 1968, Navajo Community College is a liberal arts and vocational two-year college offering the Associate of Arts Degree, the degree of Applied Sciences, and Certificates of proficiency in several vocational areas.

1/ New Mexico, University of; Bureau of Educational Planning and Development. Community College Master Planning Study, Gallup Branch 1975, Albuquerque, New Mexico, December 1975.

Navajo Community College as noted in its 1975-76 catalog has a multiple series of objectives:

1. To provide academic foundations for students who plan to transfer to a senior college or university.

2. To provide vocational-technical training programs for students.

3. To provide adult education courses for individuals who desire to further their education.

4. To provide a program of community service and community development.

5. To provide assistance and consultation upon request to public, church, and Bureau of Indian Affairs schools and other organizations or institutions in the area which the College serves.

6. To foster in its Indian Students the development and preservation of a healthy pride in their heritage.

7. To serve as a center for development of Indian cultures, with special emphasis on the Navajo. 1/

In addition to providing services at its main campus in Tsaile, NCC also has a separate and relatively autonomous branch operating in Shiprock, New Mexico.

The college has an operating budget of $3,058,000 appropriated by Congress through the Navajo Community College Bill, (P.L. 92-189). In addition, the college receives special grants of various types which enable it to pursue its mission as a center of Indian cultures.

Data provided by NCC's Office of Research in Tsaile 2/ indicate that a total of 1,116 students were enrolled at NCC for the spring semester, 1976. Of this total, 321, or 29% are enrolled in vocational/technical courses. NCC offers programs in auto mechanics, computer programming, drafting and design, nursing, welding, animal science, agriculture, secretarial, emergency medical training, and media.

NCC is also proposing to function as a prime deliverer for vocational training services using Comprehensive Employment and Training Act funds under contract from the Navajo Office of Employment and Training (NOETA). Negotiations are now on-going with NOETA. In addition to operating the Farm Training Program at the Shiprock campus, NCC will assume responsibility

1/ Navajo Community College Catalog, 1975-76.
2/ Phone Conversation with Scott Fisher, Navajo Community College and Rj Associates, Inc., Tuesday, June 22, 1976.

for the Skills Center activities now operating at the Gallup Branch and also conduct specific courses at its Tsaile campus. Nearly $1.0 million in education and training dollars would be involved in such a contract. Stipends for program participants would be an added cost. Participants in these NCC operated courses would be working toward certificates of proficiency from the college and could simultaneously, if they chose, take general education courses. They might also, at the completion of the CETA funded program, continue on at the college to receive an associate degree in a particular occupational category. Thus, the vocational training efforts of CETA and NCC are linked into broader educational objectives, and participants in training have an opportunity to pursue higher educational goals if they are interested and able.

When NCC receives the CETA funds, a position of Director (or Dean) of Career Education will be created; this Director will be responsible for the planning and development of vocational/technical programs at NCC. In the past, the individual in charge of vocational/technical programs also had responsibility for a wide range of other special projects. With a full-time Director and additional funds, NCC could grow into the primary deliverer of vocational/technical education in fields other than the construction trades.

The presence of a Director of Career Education should also improve the college's relationships with the public community colleges serving the reservation and increase the state resources available at the public community colleges. There is obviously room for these colleges to serve Navajo students, particularly since they are financed from sources other than NCC, e.g., state and local tax revenues. Working out specific mechanisms for coordination among the institutions is essential to maximize use of these resources. The Navajo Higher Education Consortium, 1/ consisting of all institutions of higher education serving the reservation, offers a vehicle through which coordination can be planned and formalized between NCC and the other colleges. A strong Department of Career Education at NCC can facilitate such coordination, thereby taking a long step toward a comprehensive system for postsecondary vocational education on the reservation. NCC and NDOE must take the initiative to encourage the various institutions to provide programs and courses on the reservation that complement each other and provide maximum training alternatives and potential on the reservation.

1/ Navajo Community College, University of New Mexico, University of Arizona, Arizona State University, Northern Arizona University, Northland Pioneer Community College, San Juan Campus, College of Ganado.

Table IV-1

Vocational Courses and Enrollment
at San Juan Campus, NMSU

Vocational Program	FALL SEMESTER 1975	
	No. of Students Served	No. of Native Americans
POSTSECONDARY FULL-TIME		
Clerk/Typist	25	13
Secretarial	25	3
Practical Nursing	16	3
Welding Technology	20	6
Auto Mechanics	9	4
Electro/Mechanical	16	2
MID-MANAGEMENT COURSES		
Intro. to Management	29	2
Principles of Salesmanship	11	1
Merchandising	13	0
Advertising	10	1
Marketing	25	5
Supervision & Leadership Trends	29	4
Cooperative Experience 1	11	4
Retailing	9	1
HUMAN SERVICES COURSES		
Human Growth & Development	32	8
Teaching Techniques for Para Prof. I	12	3
Child Care Field Exp. 1	7	3
Elementary Topics	18	4
OTHER EVENING--PART-TIME		
Intro. to Welding	40	2
Engine Tune-Up	13	1
Engine Reconditioning	13	4
	383	74

Source: Letter from Glen Gabehart, Dean, Vocational-Technical Division, San Juan Campus, New Mexico State University to Rj dated March 30, 1976.

Table IV-2

Vocational Courses and Enrollment at
Navajo Community College, Spring 1976 1/

COURSES	ENROLL.
AUTO MECHANICS	
Preventive Maintenance	13
Diagnostic & Eval of Mechanics	14
Auto Systems Reconditioning	11
	38
COMPUTER PROGRAMMING	
Introd. to Data Processing	22
Computer Programming	2
Advanced Program Technology	2
	26
DRAFTING AND DESIGN (Being Discontinued)	
General Drafting I	1
General Drafting II	2
Design Science I	1
Design Science II	1
Independent Study	1
	6
HOME ECONOMICS	
Clothing Construction	4 (nondeg.)
	6 (degree)
Foods and Nutrition	4
Navajo Family Life	6
Independent Study	1
	21
NURSING	
Maternal and Childcare	7
Navajo Aspects of Maternal and Childcare	7
Navajo Aspect of Medical Surgical	7
Navajo Aspect of Leadership in Nursing	7
Medical/Surgical Nursing II	7
Leadership in Nursing	10
	45

COURSES	ENROLL.
WELDING	
Welding World	8
Welding Metallurgy Theory	11
Welding Metallurgy Practice	11
Advanced Welding Theory	9
Advanced Welding Practice	9
	48
ANIMAL SCIENCE	
Introd. to Animal Husbandry	37 (nondeg.)
Livestock Production II	3
Introd. to Animal Husbandry	17
Animal Husbandry II	3
Animal Health Science	4
	64
AGRICULTURE	
Introd. to Agronomy	22 (nondeg.)
Farm Mechanics	20 (nondeg.)
Introduction to Agronomy	28
Farm Mechanics	23
Agricultural Math	13
	106
SECRETARIAL	
Typing IA	9
Typing IB	26
Typing IIA	9
Typing IIB	11
Shorthand IB	5
Introd. to Business	18
Secretarial Office Practice	5
Business Machines	13
Business Math	23
	119
EMERGENCY MEDICAL TRAINING	52
EMT--Instructors to Teach	7
	59

1/ Includes both Tsaile and Shiprock Branch. Total enrollments by course indicate more persons than 321 students in vocational-technical program due to student participation in more than one course.

Table IV-2 (Continued)

Vocational Courses and Enrollment at Navajo Community College, Spring 1976

COURSES	ENROLL.	COURSES	ENROLL.
MEDIA			
Newspaper	6		
Radio Broadcasting	14		
	20		
RANGE SCIENCE			
Introduction to Range Science	7		
	7		
VOCATIONAL/TECHNICAL TOTAL ENROLLMENTS	559		

Chapter V

Employment and Training Programs

A. Navajo Office of Employment and Training Administration (NOETA)

The Navajo Tribe receives funds from various titles of the Comprehensive Employment and Training Act to operate employment and training programs on the reservation. Titles I and III are the primary sources of funds for vocational training. In FY 75, according to the NOETA's Annual Report, the Tribe received $1,186,564 in Title I monies through contracts with the states of Arizona and New Mexico, and $5,782,616 through a Title III grant from the Office of Indian Employment and Training in the Department of Labor.1/

Using CETA Title I and III funds, the Tribe provides skill training in a range of different occupational categories. Table V-1 indicates the specific training categories and the number of persons being trained.

Navajo Community College presently provides training for the Farm Training program under NOETA. As we noted earlier, an expansion of NCC's involvement as a major training arm for NOETA is presently being negotiated.

One of the CETA funded programs directly involving vocational education at the secondary school level utilizes the positive characteristics of a cooperative vocational education program which provides an excellent transition from school to work. The pilot project, located at the BIA Fort Wingate High School, is contracted by NOETA to a private corporation that coordinates the training activities in housing construction trades with the classroom work provided by the school. The project, which involves 38 high school students, is designed to provide students with the necessary skills to qualify as apprentices upon completing high school. Students perform actual construction work under supervision after school hours and are paid a stipend for their work. The concept of utilizing employment and training funds to increase the availability and quality of vocational education services at the secondary level is an important addition to the reservation's vocational education system. It warrants further consideration as a means of expanding the scope of secondary school vocational education services at other Bureau high schools, as well as at the local public schools.

The emerging relationship of NCC and NOETA and the program at Wingate represent the types of coordination between education and training efforts that must be expanded to maximize the use of the resources and facilities which presently exist on the reservation.

1/ Office of Employment and Training Administration, Annual Report for Fiscal Year covering January 1, 1975 through September 30, 1975, Navajo Tribe, Window Rock, Arizona, January 1976

B. Skills Center

The capability of NOETA to deliver skill training will be significantly enhanced by the Skills Center, to be completed in two years, in Crownpoint, New Mexico. The Skills Center, financed by the Economic Development Administration, will contain complete facilities for the housing, education and training of 250 adult individuals to improve their present occupational skills or to learn new ones, concentrating on the Navajo out of school population between 16 and 30. Accommodations for single students, married students, and married students with children will be available. The Center will offer training primarily in the construction trades and related industries with a specific emphasis on preparing Navajos to fill the jobs which will be created around the industrial and natural resources development on the reservation. Navajos will also be trained to assume jobs in the construction industry that are funded with federal and state monies, such as reservation road construction where approximately 26.0 million dollars per year are spent by the BIA and the states of New Mexico and Arizona.

It is felt that this Center will respond to a wide range of training needs and solve problems in present training programs, such as trainees being scattered about the reservation in temporary and inadequate facilities. Of particular note in the Skills Center proposal is the statement that "the Tribe has had little success with programs requiring trainees to relocate at off-reservation training centers." 1/ The question of where training of Navajo people should take place is a particularly crucial one in light of past BIA policies of sending people to urban areas for training. The question will be explored more fully in our analysis of the BIA's Adult Vocational Training Program in the next chapter.

One other note must be added. The intent of this report is not to assess or evaluate the effectiveness of the CETA program on the reservation. For the purposes of this study, our focus has been necessarily limited to coordination between education and training activities on the reservation. However, in the course of this study, numerous questions were raised by individuals interviewed about the appropriateness and effectiveness of the employment and training program as it is now operating on the reservation. We believe a special study of the program would be appropriate.

1/ Navajo Tribe of Indians. Navajo Residential Skill Center, New Mexico; a proposal submitted to the U.S. Department of Commerce, Economic Development Administration, Western Regional Office, February 4, 1976.

C. CETA Special Five Per Cent Set-Aside for Vocational Education

The Comprehensive Employment and Training Act of 1973 instructs the Governor of each state to set-aside 5% of the State's CETA allocation for vocational education services requested by CETA prime sponsors.

1. Arizona

The Navajo Reservation is part of the Balance of State area in Arizona which includes all of the state outside of Phoenix and Tucson. For administrative purposes, the Balance of State is divided into Planning Areas. The Reservation is part of Planning Area III which includes Apache, Navajo, Coconino, and Yavapai counties.

In FY 75, the total CETA set-aside for vocational education for the State of Arizona was $779,441. Of this amount, Planning Area III received $90,471. 1/ Approximately $20,000 was directed to Navajo Community College to provide Adult Basic Education classes in five locations on the reservation. The remaining $70,000 went to other non-reservation communities in Planning Area III.

In FY 76, there was to be $1,120,334 available for the entire state according to the contract between the State of Arizona and the Department of Labor. Of this amount, $146,528 was earmarked for Planning Area III. The contract indicates that the funds are to be used to support services at the institutions noted in Table V-2.

Data from the Arizona Department of Vocational Education which administers the 5% set-aside funds indicate that in FY 76 the institutions serving Navajo actually received only the following amounts:

Northland Pionneer	$10,500
College of Ganado	5,000
Navajo Community College	10,500

No information was available to indicate the reasons for the discrepancy between the proposed amounts indicated in the contract and actual figures allocated by the Arizona Department of Career and Vocational Education.

1/ Arizona, Manpower Report to the Governor, FY 1975 prepared by the Arizona Department of Economics, Manpower Planning and Evaluation Section, December 1975.

Table V-1

CETA-Funded Training Programs 1/

Type of Training	Number Being Trained	Agency Providing Training
Agriculture:	69	
Farm Training	43	Navajo Community College
Cattle Ranchers	8	Navajo Agriculture Products Industry
Cattle Management	2	Navajo Agriculture Products Industry
Farmhand, Livestock	15	Navajo Agriculture Products Industry
Feedmill Operator	1	Navajo Agriculture Products Industry
Distributive:	7	
Sales Clerk	7	Gallup Skill Center
Office:	31	
General Clerk	31	Gallup Skill Center
Technical:	9	
Water and Waste	9	Water/Waste Water
Trade and Industry:	266	
Construction Trades		
Lather	9	Human Resources Development Inst.
Millwright	7	Human Resources Development Inst.
Electrician	13	Human Resources Development Inst.
Mechanics	3	Human Resources Development Inst.
Carpentry	13	Human Resources Development Inst.
Heavy Equipment Operators	9	Human Resources Development Inst.
Ironworkers	11	Human Resources Development Inst.
Ironworkers	46	Ironworker's Union
Heavy Equipment Operators	71	Navajo Engr. and Constr. Authority
Pipefitters	19	Pipefitter's Union
Housing Construction Trades	38	XYZYX
Other Skilled Occupations:	27	
Truck Drivers	1	Navajo Engr. and Constr. Authority
Machine Repairmen	12	Small Business Repairmen
Opticians	14	Navajo Optics

Source: Navajo Office of Employment and Training, Navajo Tribe, Window Rock, Arizona.

1/ There are also 18 individuals in Basic Education, 4 in Orientation, and 16 in GED.

Table V-2

Planning Area III (NACOG*) Fiscal Agreements

Academic Institution	Persons Served	Programmed Funds
Northern Arizona University (Flagstaff)		
Clerical occupations	58	$ 29,654
ABE/GED	75	15,500
Yavapai College (Prescott, Verde Valley, Bagdad)		
ABE/GED	132	20,900
Northland Pioneer College (Holbrook, Winslow, Araibe, St. Johns)		
ABE/GED	80	16,780
Ganado College (Navajo Reservation)		
ABE/GED	10	10,000
Navajo Community College (Nazlini, Cottonwood)		
ABE/GED	103	14,000
	458	

Programmed Funds	$106,834
Unprogrammed Funds	39,694
Total Allocation	$146,528

* Northern Arizona Council of Governments

Source: Modification of Grant No. 04-5037-18 from Dept. of Labor, Manpower Administration, Region IX to Department of Economic Security, State of Arizona, February 2, 1976.

The Arizona contract indicates that all but $29,654 of $106,834 of programmed funds are to be utilized for Adult Basic Education and GED. Since there are sources of funds for ABE and GED other than CETA 5%, institutions should be encouraged to seek funds from those sources, and thereby free CETA monies for vocational education services.

2. New Mexico

The total amount of CETA 5% funds in New Mexico in FY 1975 was $413,059. None of these funds was allocated to programs serving Navajos.

In FY 1976, $719,375 was available in 5% set-aside funds. The New Mexico Department of Vocational Education entered into a contract with NOETA for training in construction trades in Farmington. This program involved the training of 15 people, 5 Navajos and 10 non-Navajos. The State of New Mexico contributed approximately $30,000 to the program to support the non-Navajo participants and NOETA contributed approximately $10,000 to cover the costs of the Navajo participants.

In order to improve the utilization of CETA 5% funds on the reservation, the states and NOETA might consider entering into a contract to permit NOETA to use the 5% monies to plan and operate the programs that serve the reservation portion of each state.

Chapter VI

Vocational Education in the Bureau of Indian Affairs

Bureau of Indian Affairs' policy on vocational education has undergone significant changes over the last 25 years. At one time, the Bureau required all students to take either home economics or industrial arts to graduate from high school. Emphasis on vocational education as opposed to academic programs was so great that Indian people became outraged, arguing that their children were not getting a proper education and were being geared into dead-end jobs. The fact that the vocational training being offered by BIA schools was not designed to prepare Indians for employment became evident with the failure of the relocation program of the 50's. Having completed vocational training programs in Bureau schools, Indians were relocated in cities where it quickly became clear that they were too poorly trained to compete in the local labor market. 1/

The Bureau's reaction was to alter radically the educational objectives of Bureau schools. "...A new policy was set forth which, in theory, ended vocational education in Bureau high schools. Under the revised policy, BIA high schools would provide only pre-vocational educational." 2/ All Bureau education programs were directed at preparing those Indian students who completed high school to enter college. "One study states that there is a 'built-in bias' in all high schools in providing counseling for college-bound students, but very little guidance for those students interested in vocational schooling. Reports from Bureau personnel confirm that this attitude is even more prevalent in Bureau schools." 3/

A review of the prevocational training programs at four Bureau schools in 1969 indicates the extensive weaknesses in the implementation of the Bureau's prevocational education policy:

1/ The Special Subcommittee on Indian Education of the Committee on Labor and Public Welfare, United States Senate 1969 report Indian Education: A National Tragedy--A National Challenge as quoted in Indian Education Confronts the Seventies.

2/ Ibid.

3/ Ibid.

Stewart Indian School: It is readily apparent that not only does the high school prevocational effort at Stewart fail to prepare the student for employment, but it also fails to prepare him for further vocational training.

Flandreau Indian Boarding School: The curricula is intended to be prevocational, but the evaluation team found considerable confusion as to the specific goals of the school... The students appear to want more vocational training as (they) are spending more time in the shops than they did the previous year when classes were an hour long... In defense of the administrators of Flandreau school, it can be said that the 'confusion' as to its purpose and goals reflects the indecision and vacillation at the policymaking levels of the Bureau.

Sherman Institute: Even had the vocational program of the school been found adequate, it could not have operated effectively in light of the serious general deficiencies. The evaluators found that the industrial arts courses appeared to be 'hobby shops.'

Chilocco Indian School: The program at Chilocco is inadequate in every respect. The classes are too large, there is not enough equipment, and what equipment they have is obsolete and inoperable. 1/

While the present study did not examine the quality of the vocational program at the BIA high schools, there is little in our review of BIA policy and programs to indicate that the situation has improved since 1970. There is, however, a growing realization among Indian people that not every student should or could go to a four year college. A new recognition has been emerging that many children could find employment in skilled and technical occupations and, therefore, would benefit from vocational education. The BIA has been far slower to recongize the issue. While there has been some expansion of programs at the postsecondary level, (the opening of the Southwest Indian Polytechnic Institute in particular), a BIA memo dated April 16, 1975, indicates that in FY 75, $6.25 million or approximately 3% of the BIA education budget was spent on vocational education programs in the BIA. Two-thirds of that money was spent at the two postsecondary institutions, SIPI and Haskell. Five Area Offices of the Bureau (Eastern, Aberdeen, Muskogee, Phoenix, and Juneau), reported no vocational education expenditures. 2/

1/ Ibid.

2/ Memorandum of April 16, 1975 to the Director of Indian Education Programs from the Chief, Division of Continuing Education, Subject: Vocational Education in BIA Schools.

Chapter VI

Vocational Education in the Bureau of Indian Affairs

Bureau of Indian Affairs' policy on vocational education has undergone significant changes over the last 25 years. At one time, the Bureau required all students to take either home economics or industrial arts to graduate from high school. Emphasis on vocational education as opposed to academic programs was so great that Indian people became outraged, arguing that their children were not getting a proper education and were being geared into dead-end jobs. The fact that the vocational training being offered by BIA schools was not designed to prepare Indians for employment became evident with the failure of the relocation program of the 50's. Having completed vocational training programs in Bureau schools, Indians were relocated in cities where it quickly became clear that they were too poorly trained to compete in the local labor market. 1/

The Bureau's reaction was to alter radically the educational objectives of Bureau schools. "...A new policy was set forth which, in theory, ended vocational education in Bureau high schools. Under the revised policy, BIA high schools would provide only pre-vocational educational." 2/ All Bureau education programs were directed at preparing those Indian students who completed high school to enter college. "One study states that there is a 'built-in bias' in all high schools in providing counseling for college-bound students, but very little guidance for those students interested in vocational schooling. Reports from Bureau personnel confirm that this attitude is even more prevalent in Bureau schools." 3/

A review of the prevocational training programs at four Bureau schools in 1969 indicates the extensive weaknesses in the implementation of the Bureau's prevocational education policy:

1/ The Special Subcommittee on Indian Education of the Committee on Labor and Public Welfare, United States Senate 1969 report Indian Education: A National Tragedy--A National Challenge as quoted in Indian Education Confronts the Seventies.

2/ Ibid.

3/ Ibid.

Stewart Indian School: It is readily apparent that not only does the high school prevocational effort at Stewart fail to prepare the student for employment, but it also fails to prepare him for further vocational training.

Flandreau Indian Boarding School: The curricula is intended to be prevocational, but the evaluation team found considerable confusion as to the specific goals of the school... The students appear to want more vocational training as (they) are spending more time in the shops than they did the previous year when classes were an hour long... In defense of the administrators of Flandreau school, it can be said that the 'confusion' as to its purpose and goals reflects the indecision and vacillation at the policymaking levels of the Bureau.

Sherman Institute: Even had the vocational program of the school been found adequate, it could not have operated effectively in light of the serious general deficiencies. The evaluators found that the industrial arts courses appeared to be 'hobby shops.'

Chilocco Indian School: The program at Chilocco is inadequate in every respect. The classes are too large, there is not enough equipment, and what equipment they have is obsolete and inoperable. 1/

While the present study did not examine the quality of the vocational program at the BIA high schools, there is little in our review of BIA policy and programs to indicate that the situation has improved since 1970. There is, however, a growing realization among Indian people that not every student should or could go to a four year college. A new recognition has been emerging that many children could find employment in skilled and technical occupations and, therefore, would benefit from vocational education. The BIA has been far slower to recongize the issue. While there has been some expansion of programs at the postsecondary level, (the opening of the Southwest Indian Polytechnic Institute in particular), a BIA memo dated April 16, 1975, indicates that in FY 75, $6.25 million or approximately 3% of the BIA education budget was spent on vocational education programs in the BIA. Two-thirds of that money was spent at the two postsecondary institutions, SIPI and Haskell. Five Area Offices of the Bureau (Eastern, Aberdeen, Muskogee, Phoenix, and Juneau), reported no vocational education expenditures. 2/

1/ Ibid.

2/ Memorandum of April 16, 1975 to the Director of Indian Education Programs from the Chief, Division of Continuing Education, Subject: Vocational Education in BIA Schools.

The scope of the Adult Vocational Training (AVT) Program, which has financed vocational training primarily in off-reservation proprietary schools far exceeds the limited vocational education programs in the Bureau's secondary schools. In recent years, the BIA has invested approximately $3.0 million per year at Navajo in AVT, making it a program of major significance for training Navajo people.

The remainder of this chapter examines Bureau vocational education policy and programs in detail. The chapter is divided into five parts.

A. Vocational Education in Secondary Schools on Navajo

B. BIA Postsecondary Institutions

C. The Adult Vocational Training Program

D. The BIA Career Development Program

E. Summary

A. BIA Secondary Schools

1. BIA Vocational Education Policy

The limited funding and attention the Bureau gives secondary school vocational education is reflected in the fact that there is no organizational unit nor educational specialist responsible for vocational education in the entire Bureau of Indian Affairs. No one at the Albuquerque Indian Resources Center or in the Area Offices focuses solely on vocational education; nor is there a consistent set of policies which govern the vocational education program administered by the Bureau.

A BIA high school interested in providing a vocational education course or program must pursue that goal on its own. There are no funds earmarked specifically for vocational education. Thus, a Bureau school initiating a vocational education program must utilize regular education funds to do so. Given the absence of special funds and the high cost of vocational education programs, one cannot be surprised at the limited course offerings.

Vocational education instructors are left to their own devices if they want to modify, improve, or add vocational programs. There is no technical assistance available either at the agency, area, or the central office level. The problem of creating new programs and maintaining the old is further complicated by a national shortage of vocational education teachers, which is even more severe in isolated rural areas. There is no evidence of any special recruitment or training efforts being undertaken by the Bureau to compensate for these shortages.

The absence of vocational education policy and lack of programs in the Bureau schools has been the subject to Congressional scrutiny. Reviewing the BIA activities was part of the House Committee on Education and Labor's examination of vocational education programs serving Indians. The Committee states that it hopes:

> that the BIA will reverse its present policy of not funding vocational education programs with its own funds and begin to provide these programs for its charges. 1/

However, without funds earmarked for the purpose, the BIA would have to transfer funds from high school education operations in order to establish vocational programs. The result of such action might well be a weakening of the basic high school program and still a less than adequate vocational education program.

Apparently, the House Committee's action has had some immediate effect. A Committee on Vocational Education has recently been formed at the BIA Navajo Area Office, consisting of Bureau educational personnel from each Agency and the Area Office. According to our interviews with Area Office staff, this interest in vocational education comes on the heels of a directive from Washington to get vocational education into the Bureau schools, although no funds have been appropriated to do so.

In addition to the lack of funding, the Committee in Navajo Area Office is operating without guidance, direction, or technical expertise and without input from NDOE. Bureau staff who were interviewed in late March were hopeful that this study would give them much of the specific information they needed and would provide them with a focus for their own efforts.

The specific mandate of the Bureau Committee is to determine what jobs are available on the reservation, to incorporate the training for these jobs in the Bureau high schools, and to establish an office for vocational education at the Area level. To assist in achieving these objectives, the Bureau has earmarked all lapsed education funds (approximately $200,000) to be used for vocational education. Given the limited amount of funds, one would hope that careful planning and analysis, as well as consultation with the tribe, would occur before specific programmatic decisions are made. At the time of our interviews at the end of March, however, Bureau personnel had made no plans to contact NDOE. Follow-up revealed that there has been no Bureau/tribal contact through August. As has too often been the case with Bureau programs, much of the planning and development of programs takes place autonomously without consulting with the tribe. The Bureau often duplicates work already done or proceeds without input and guidance from the very people their policies and programs directly affect. The Navajo Division of Education has already acquired a great deal of information through its Educational

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1/ House Committee on Education and Labor, Report No. 94-105, May 4, 1976 p. 27.

Hearings and the preliminary findings of this study. Additionally, the tribe's Office of Program Development is developing employment and manpower projections for the reservation which the Bureau should utilize rather than initiating its own study. To have the Bureau proceeding as it apparently is--independent of the tribe--and without substantive technical support, seems to bode poorly for the success of their efforts in vocational education.

Ironically, in a follow-up telephone conversation late in June, we learned that the Committee had never met. Moreover, as of June 21, there was a good chance that most of the lapsed education funds would be returned to the U.S. Treasury--an inescusable result given the paucity of funds for secondary school vocational education. Such events verify the problems of vocational education in the Bureau.

2. The BIA and Federal Vocational Education Funds

The failure of the Bureau to have an on-going vocational education program, with appropriate supporting offices and staff, is perhaps one of the reasons that Bureau schools have never received funds through the Federal Vocational Education Act. As we indicated earlier, federal vocational education funds are distributed to states by means of a formula based on population with a heavy weight given to 15-24 year olds. All Indians living in a state, including those attending Bureau schools, are counted in determining the population base to be used in the formula. Yet none of the federal vocational education funds has ever gone to the Bureau schools.

The states admit that the Indian students are indeed being counted and not being served. They argue, however, that they cannot legally provide vocational education funds to Bureau schools because the federal regulations require that a school make a reasonable tax effort and make local expenditures to support vocational education programs in order to receive federal vocational education funds. The Bureau schools, the states note, are federally-sponsored and have no local tax effort; therefore, any expenditures for vocational education would be federal dollars, and one cannot match federal dollars with other federal dollars unless explicitly authorized by legislation. The result of this is that Indian students are counted, but no legislative or administrative mechanism has been developed for the funds to be made available to Bureau schools. The BIA Fort Wingate High School inquired about securing funds from the New Mexico Department of Vocational Education and was informed it would be illegal for the state to do so.

It is more than ironic that the Bureau, which does not allocate its own funds for vocational education, has taken no action to assure that its students receive their fair share of federal vocational education monies. In effect, Bureau action to decrease the emphasis on vocational education and inaction to argue strenously at the administrative or legislative level that Indians have

a right to their fair share of federal vocational education funds have left students in BIA high schools without the benefit of an adequate vocational education program. Indian students are in need of the vocational education programs which these financial resources could support, but have been deprived of the services. (The new federal vocational education legislation does not resolve this problem although it represents a major step forward by making vocational education funds directly available to tribes; see Chapter VIII for a more detailed discussion of the Indian provision of the new legislation.)

3. Participation of Students in Non-Profit Schools

Participation by BIA students in public vocational education programs is another alternative that, in our view, is consistent with the provision of Section 102.7 of the vocational education regulations. Federal regulations require that vocational education services must be provided to students enrolled in non-profit private schools and provision must be made for the participation of such students. It seems impossible that the concern of Congress to assure that disadvantaged students in parochial and other private schools receive vocational education, was not also intended to include students in BIA schools serving disadvantaged Indian students. Indian students in BIA or mission schools cannot be considered to have equal access to vocational edudation programs in public schools if no provision is made to transfer students from one school to another, if there are no provisions for purchasing the training where it is available and no initiative has been made by the state, the local school district or the BIA to make such involvement possible.

The state officials did not see any obstacles to Bureau students participating in programs at public schools if the schools involved could agree and work out the logistics. This situation is occurring at Tuba City, Arizona, where there is a joint BIA/public high school; although there is much controversy over the extent to which the school is actually operated on a joint basis, insofar as vocational education is concerned, courses are provided by the public school portion and Bureau students are free to participate. These programs are supported by the state with federal and state vocational education funds. Other Bureau high schools have not attempted to make similar arrangements with public schools.

Creative utilization of the regulations on private non-profit schools could enable Bureau schools to receive the funds which have been generated by the presence of BIA students in the state population, but which have not gone to serve those students. The level of cooperation which would be required between the state, the local school district and the Bureau to make such an arrangement would be very difficult to achieve, however, given the past and present relationships between these educational units at Navajo. Until there is a change in the federal vocational education law to provide funds directly to Bureau schools, this is the only alternative available and it should be pursued vigorously by the Bureau. A more direct method of assuring that BIA students have access to federal vocational education is clearly warranted. Three options are available; 1) the states could be

required to include in their state plans specific plans whereby vocational education services would be offered to Bureau students using the private school provision; 2) legislative authorization for the BIA to be funded directly by BOAE as a "51st state," as is presently done by OE for the Title I ESEA program; 3) states could be authorized by law to contract for vocational education programs in Bureau schools. The second option is the best, although it might lead to duplication of effort and fragmentation of the limited vocational education training in the area. Coordination between Bureau and public schools is essential if a rational comprehensive vocational education system is to be developed on the reservation. Unless there is such coordination, the limited resources available to the different parties will continue to be inadequate. Therefore, we propose option 2 with a special requirement for BIA public school coordination.

3. Problems with Securing Information from BIA Schools

This research effort experienced difficulties in securing data on the vocational education programs in Bureau schools. The problems encountered are relevant insofar as they may indicate future problems that may be experienced in trying to improve the Bureau's vocational education program. The Area Office does not maintain centralized records that reflect the courses and enrollment at the Navajo Area high schools; therefore, it was necessary to request the information from each school. The schools were requested to provide:

- Enrollment data indicating the total school enrollment and enrollment by vocational education courses.
- Total school budget and the amount expended for vocational education programs.

This information was requested of the following schools: Wingate, Many Farms, Albuquerque Indian School, Phoenix Indian School. The latter two schools were included in order to determine the priority given vocational education by Bureau schools in different areas.

Despite repeated efforts, staff of Many Farms High School claimed that release of such information "had to go through channels." Whatever those channels, no information was provided. Through the intervention of an education specialist in the Area Office the school was prodded enough to provide course enrollment and budget information.

Wingate High School responded to the request for enrollment information but would not release any budget information. Research staff working on this study were informed by the school that there was no reason this information was needed. Such a response is unacceptable and reflects the vestiges of the old colonial attitude of the BIA of earlier times. Budget information is not protected from public inspection by any law. It is, in fact, public information and should not be withheld from anyone, particularly from the

Navajo Tribe whose children are supposedly being served by Bureau schools. After considerable effort, the Area Office finally released budget information.

Phoenix Indian School provided extensive enrollment information and course descriptions and indicated a total school budget of $2,287,239. They did not, however, break out the amount being expended for vocational education.

Albuquerque Indian School agreed to provide the information, but several follow-up requests had to be made to secure the information.

The lack of responsiveness on the part of Bureau schools reflects even more negatively when compared to the response of the public school districts which were extraordinarily helpful in most cases with providing the requested information. For the tribe to have so many obstacles when simply trying to obtain data makes any rational plan for self-determination virtually impossible. It also leaves one with the pressing question of why this uncooperative attitude prevails.

4. BIA Secondary Schools--Enrollment

Table VI-1 shows the total enrollment of each school and the number of students enrolled in the vocational education programs. The Bureau schools do not utilize the Office of Education program codes; therefore, the courses on the table were organized to conform to those program codes.

At Wingate High School, only 13% (87) of the students participate in the six courses vocational education offered. Of these students, 66% are enrolled in Trades and Industry and 11% in Office Occupations. The programs offered at Wingate are clearly prevocational and are not designed to prepare students for employment.

The Industrial Education supervisor at Wingate indicated a real need to expand the scope and nature of the program. He identified two possible approaches for expansion. First, by offering vocational education courses to freshmen, rather than begining programs in the sophomore year, the school could then offer a three hour job training instructional program to students by their senior year. Secondly, the school might offer a fifth year for students who wanted further training in a particular occupation. Presently, there are no funds available to finance such a fifth year program. It is possible that AVT funds could be utilized for this purpose. A complete discussion of this and other alternatives are contained in the section of this report which examines the AVT program in-depth. Whether either of the two options are pursued, the existing resources at the school, e.g., equipment, facilities, and dormitories, (albeit some may not be in the best condition) can be more effectively and efficiently utilized given proper planning, program development, and tribal participation. A strong interest to expand and improve the vocational program at Wingate has been expressed;

however, the financial resources and technical support are simply not available.

At Many Farms High School, 23% of the vocational education students were enrolled in Agriculture, much higher than the 8% at Wingate. Trades and Industry represented the largest enrollment with 47%. Thirty-three percent of Many Farms' total enrollment of 625 students participated in ten vocational education courses.

Albuquerque Indian School offers a prevocational program only, with courses in wood shop, metal shop, arts and crafts, home economics and silversmithing. The school has a cooperative relationship through which about eight to ten students a year participate in the more advanced vocational program at Southwestern Indian Polytechnic Institute. Twenty-five percent of the 448 students at the Albuquerque Indian School are Navajo. Approximately 40% of all the students participate in the prevocational classes.

At Phoenix Indian school on the other hand, 40% of the total enrollment of 596 participated in 17 different vocational education courses. At Phoenix as at Wingate, the enrollment in Trades and Industry is high (53%). Office occupations account for 28% of the vocational enrollment.

Because there is no Bureau policy for vocational education, one can only surmise that the significant differences in the vocational education course offerings and enrollment result from variation in local schools' policies.

It is clear that the decision to emphasize or not to emphasize vocational education is at the discretion of the school principal. The BIA School Boards have little power and function in an advisory capacity only. A closer look is needed to determine those factors that influenced a principal to make such decisions. Even more important, however, is the total absence of an overall vocational educstion policy by the Bureau.

Table VI-1

BIA High Schools--Courses and Enrollment

Prevocational Education Programs	BIA HIGH SCHOOLS					
	WINGATE		MANY FARMS		PHOENIX	
	# of Students Enrolled	% of Tot Voc Students	# of Students Enrolled	% of Tot. Voc Students	# of Students Enrolled	% of Tot Voc Students
01 Agric.	8	11%	49	23%	0	0%
04 Distrib.	0	0	0	0	0	0
07 Health	0	0	4	2%	10	4%
09.02 Home Econ. Occup. Prep.	0	0	40	19%	0	0
14 Office	10	11%	17	8%	67	28%
16 Tech.	0	0	0	0	0	0
17 Trades and Industry	57	66%	99	47%	128	53%
Welding	12					
Building Trades	33					
Auto Mechanics	12				35	
Woodworking			27		17	
Metal-			40		28	
Drafting			18		25	
Printing					18	
Upholstry					5	
Catering Food			14			
Subtotal--Students in Training	75	86%	209	100%	205	85%
Other Courses--Non-training	12	13%			35	15%
Total--All Students in All Vocational Courses	87		209		240	

B. BIA Postsecondary Institutions

The BIA administers two major postsecondary institutions which offer substantial vocational technical programs: Southwestern Indian Polytechnic Institute, in Albuquerque, and Haskell Indian Junior College in Lawrence, Kansas.

Each of the two schools is administered through the Area Office in which it is located (Albuquerque Area Office for SIPI; Anadarko Area Office for Haskell). The funds for the schools are part of the school operations portion of the education budget of the Area Office. The line item "school operations" does not distinguish secondary schools from postsecondary schools. This absence of a national line item in the Bureau's budget for postsecondary education reflects the Bureau's lack of a general vocational education policy.

The two schools do not charge tuition or room and board for students under 26 years of age; a married student or a student over 26 can attend tuition-free but is not permitted to live inthe dormitory and must provide her/his own living costs. These living costs can be provided by the Bureau's Adult Vocational Training (AVT) Program, however.

The postsecondary institutions function independently, with each deciding what courses to offer. SIPI, open since 1971, considers itself to be primarily a vocational/technical institution and offers only a vocational curriculum. Certificates are provided in specific occupational categories. Haskell came into existence in 1885 with a curriculum of agricultural manual labor for grades 1 - 5 and over the years expanded its curriculum into secondary and postsecondary programs. Today, Haskell considers itself a comprehensive junior college offering trade and technical programs as well as an academic degree.

There is apparently competition and lack of coordination between SIPI and Haskell insofar as their vocational technical programs are concerned. This occurs, in part, because officials at each school have little knowledge or information about the other's programs and activities. This lack of coordination emerges from the absence of a Bureau policy on postsecondary vocational education and the process whereby the schools receive their funds. The institutions are funded to an extent on the basis of the number of students enrolled. Therefore, even if there are openings in an existing course at SIPI, Haskell might offer a similar course in order to maintain or increase its enrollment. The result is that both schools offer courses in electronics, drafting, data processing, offset lithography, secretarial and clerical occupations, food preparation and dental assistant. The argument that the schools serve different parts of the country and must, therefore, offer similar courses does not withstand scrutiny, because it is not uncommon for a student to transfer from one school to the other. Thus, if students were properly counseled, they could be directed to the institution which best meets their needs and Bureau resources would thereby be more effectively utilized. Unfortunately, this is seldom the case.

1. Southwestern Indian Polytechnical Institute (SIPI)

SIPI was financed at a level of $3,213,658 in FY75. Approximately 90 Tribes are represented at SIPI, Navajos comprised 34% of the total enrollment in April 1976 (See Table VI-1).

a. Underenrollment at SIPI

SIPI has dormitory space that can accommodate 500 students and classroom facilities to serve 750 students. According to April 1976 enrollment information, there were 398 students attending SIPI, utilizing only 54% of its total capacity. The reasons for such underenrollment are unclear. According to the Placement Officer at SIPI, enrollment is down in April because students leave to find summer jobs before the college students. An open-entry, open-exist policy at SIPI allows students to come and go, whether or not they have completed training. The students can leave early for summer jobs and return in the fall; even so, April is very early for such an exit. At peak enrollment periods during the months of October and February, the total enrollment at SIPI was 499 and 452 respectively, indicating an underutilization of 33 to 40% of classrooms and facilities. Officials at SIPI also pointed out that the enrollment at many Indian-controlled community colleges is dropping, implying that SIPI's underenrollment merely reflected this phenomenon.

Some people have suggested that because of its name, "Southwestern" Indian Polytechnic Institute, Indians from other parts of the country are

Table VI-2

Tribal Representation Among SIPI Enrollment

	SIPI Enrollment		Percent of Total Indian Population in Lower 48 States
Navajo	134	34%	31%
Southwestern Tribes (Other than Navajo)	104	26%	18%
Other Tribes	156	40%	51%
Total Enrollment	384	100%	100%

SOURCE: Southwestern Indian Polytechnic Institute, enrollment printout, April 14, 1976.

under the impression that the school will only serve Indian students from the southwest. This misperception would appear to be compounded by the fact that the Board of Regents at SIPI is made up entirely of Indians from the southwest.1/ Enrollment at SIPI belies this argument, however; Table VI-1 indicates that 40% of the enrollment is comprised of Indian students from outside the southwestern area. Given these data, it is difficult to accept a misunderstanding that SIPI is intended for southwestern students only as a basis for the underenrollment.

The responsibility for dispelling such a myth, if it does indeed exist, would lie with BIA Employment Assistance and Adult Vocational Training staff who have the responsibility of counseling and guiding potential students who desire training.

These theories offer only a partial explanation of underenrollment at SIPI and leave much open to question, particularly, why there are not more students referred from Navajo.

b. Assessing the SIPI Program

A qualitative review of the program at SIPI is made nearly impossible by the absence of follow-up data on the students served by the school. This absence of data also resulted in SIPI losing Veteran's Administration (VA) funds; VA disqualified SIPI as an eligible institution because it had not performed required follow-up studies of at least 50% of former students. The loss of VA benefits means that veterans who are over 26, and therefore, not eligible for free tuition, room and board, must leave the school or their costs must be picked up by the Adult Vocational Training Program. In the latter case, AVT funds which could be available to support another individual must finance the veteran who cannot secure VA benefits, resulting in a net loss of funds to Indians for postsecondary vocational education. To remedy this situation SIPI has just completed such a study utilizing a survey developed by the VA.

SIPI conducted a survey of former students who left the school during October 1972, March 1973 and November 1973. With a response rate of 33% (63 our of 193), the survey showed that 67% of the former students had been employed full-time since leaving SIPI. Only 14% of the students obtained full-time jobs in the area for which they were trained; 13% of the jobs were related to the training, but 52% were different from the training. (20% did not respond to this question.) Thirty-three percent of the students felt that the training at SIPI was adequate and 42% responded that it was not adequate (24% did not respond to this question). Forty-eight percent were satisfied with their present jobs.

1/ Two of the twelve members of the SIPI Board of Regents are Navajo from Arizona; of the remaining ten persons, seven are from New Mexico, two from Colorado and one from Nevada.

Twenty-seven percent of the former students attended other schools or training programs after leaving SIPI; 25% of the further training was in-service, 18% at other vocational schools and 31% attended a college or university. Seventy percent indicate that they are interested in getting further education or training.

In response to a question regarding the effectiveness of the Placement Office at SIPI, 68% responded that the Placement Office offered no help to the student in getting a full-time job. Forty-six percent obtained their first job on their own.

The limited nature of the follow-up survey data makes any specific conclusions concerning the programs of the school impossible. An important question is why no comprehensive system for securing follow-up data has been set in in place by the school or required by the Bureau. However, this seems to be an outcome of the absence of an office in the Bureau which focuses on postsecondary vocational education throughout the Bureau.

c. SIPI Course Offerings

SIPI offers vocational training in the following occupational areas: accounting and keypunch operation, marketing and distribution, secretarial-clerical, civil engineering aid, commercial food, cooking, drafting, electronics, offset lithography, optical technology, telecommunications and dental assistant (see Table VI-2). The highest percentage of Navajo students (27%) are enrolled in Secretary-Clerical Occupations, followed by Electronics (15%).

Arrangements have been made with the University of Albuquerque to permit SIPI students in certain technical areas to obtain an Associate of Science Degree. Such a degree will be conferred when SIPI can certify that a student has completed her/his course of training at SIPI and 20 hours of general education courses at the University of Albuquerque. At the onset, SIPI students pursuing such a degree will attend the general education courses at the University of Albuquerque; if as many as fifteen SIPI students request a course, the teachers from the University of Albuquerque will come to SIPI to provide the course.

Navajos from every BIA agency on the reservation are represented at SIPI, with the highest representation from the Eastern Navajo Agency which accounts for 25% of the Navajo enrollment at SIPI. Both Ft. Defiance and Shiprock Agencies account for 22% and the smallest enrollment is from Western Navajo (11%). (See Table VI-3.)

Upon arriving at SIPI, students are assisted in making career choices by a counselor at the school. According to officials at SIPI, national needs are examined to determine labor force demand and to decide what courses will be offered. There are Advisory Councils in

Table VI-3

SIPI Course and Enrollment

		Navajo	%	Non-Navajo	%	Total Enrollment 4/23/76	%
01	Agriculture	0	0	0	0	0	0
04	Distributive						
	Mktg. & Dist.	8	6%	18	7%	26	6%
07	Health						
	Optics	4	3%	15	6%	19	5%
	Dental Asst.	3	2%	12	5%	15	4%
	Dental Lab.	0	0%	10	4%	10	3%
09.02	Home Economics						
	Occup. Preparation	7	5%	22	8%	29	8%
14	Office						
	Secretarial/Clerical	36	27%	46	18%	82	20%
	Num. Proc.	9	7%	15	6%	24	5%
16	Technical						
	Engineering Aide	11	8%	13	5%	24	6%
17	Trades and Industry						
	Drafting	8	6%	16	6%	24	7%
	Electronics	20	15%	25	10%	55	12%
	Offset Lithog.	8	6%	38	15%	46	12%
	Telecommun.	13	10%	13	5%	26	6%
	GED	7	5%	17	7%	23	6%
Total		134				394	

Source: Southwestern Indian Polytechnical Institute, Computer Printout, January 1976.

each occupational area comprised of people from the local community who assist in determining what the labor force needs are. The Advisory Councils, made up of people from the Albuquerque Area, are in a position to inform SIPI of the labor force needs in Albuquerque, but can do little to assist in making determinations about other areas. According to officials at SIPI, it is the responsibility of the SIPI counselor to contact the Employment Assistance Office at the Area Office from which a student comes to determine what the employment needs are in her/his home area. No information was available to enable us to determine whether this system actually works. There are no data that report the extent to which students return to their home area and find employment through the Employment Assistance Office. A previously mentioned survey of former students showed that only one student had obtained employment with the help of Employment Assistance.1/

Table VI-4

Agency Representation of Navajo Students in Vocational/Technical Programs at SIPI and Haskell

AGENCIES	SIPI % OF STUDENTS	HASKELL % OF STUDENTS
Chinle	13%	11%
Eastern	25%	28%
Ft. Defiance	22%	33%
Shiprock	22%	11%
Western	11%	11%
Navajo Area	5%	5%
Ramah	2%	6%

Source: Computer printouts of SIPI and Haskell, 1976.

1/ Cordova, Rudy & Alex Peralta. An Evaluation of the Follow-up Survey of Former Southwestern Polytechnic Institute Indian Students, prepared by Southwestern Indian Polytechnic Institute and The University of Albuquerque, Office of Institutional Development, Fall 1974.

2. Haskell Indian Junior College

Haskell is administered and funded out of the Anadarko Area Office. In addition to its academic objectives, one of its educational goals is "to provide vocational and technical programs designed to prepare students for employment and to prepare students for advancement beyond the entry levels of employment into positions of managerial responsibility."1/

Twenty different vocational/technical courses are offered at Haskell. They include the following:

Welding	Dental Assistant
Auto Body	Medical Laboratory Technician
Auto Mechanics	Occupational Health
Carpentry	Practical Nursing
Food Service	Radiation Technician (being phased out)
Graphic Arts	Home Economics
Machine Shop	Business Education
Masonry	Data Processing
Painting	Refrigeration and Air Conditioning
Technical Drafting	Electronics/Electro Technology

Of the total student enrollment (1,186) at Haskell, 7% (87) are Navajo. Ten percent of all the vocational students (626) are Navajo. Of the total number of Navajo students at Haskell, 58% are in the vocational program.

In the vocational program, the highest enrollment is in Business Education, both for the Navajo students (39%) and the non-Navajo students (35%). The next area that attracts a high Navajo enrollment is in the Health Occupations which includes dental assistant, medical lab technician, and practical nursing, (22%); this may be due to the fact that training in this area is not readily available at other schools. (Navajo enrollment in the dental occupations is low at SIPI). The Navajos have a higher enrollment (14%) in the Technical Occupations (Electronics and Electric Technician) than the non-Navajos (10%), but a lower enrollment (20%) than the non-Navajos (32%) in Trades and Industry. (See Table VI-4).

All BIA agencies from the Navajo Area are represented at Haskell. Students from Ft. Defiance and Eastern Navajo Agencies represent the greatest percentage (33% and 28%) with 11% coming from each of the other three Agencies. (See Table VI-3.)

Officials at Haskell indicated that they know what job possibilities are and where they are, but it is not clear exactly how they make their determinations. The point was made that industries are looking for minorities and that many come to Haskell to recruit students. Most Navajo, they said, do not go back to the reservation, but migrate to metropolitan areas, e.g., California and D.C. The reason given for not returning to the reservation is that there are no jobs there.

1/ Haskell Indian Junior College Catalog.

Table VI-5

Haskell Courses and Enrollment

		Navajo	%	Non-Navajo	%	Total Enrollment	%
01	Agriculture	0	0	0	0	0	0
04	Distribution	0	0	0	0	0	
07	Health	14	22%	117	21%	131	21%
	Dental Assist.	7	11%	34	6%	41	7%
	Medical Lab. Tech.	2	3%	1	1%	3	1%
	Occup. Health	0	0	7	1%	7	1%
	Practical Nursing	5	8%	74	13%	79	13%
	Radiation Tech.	0	0	1	1%	1	1%
09	Home Economics	3	5%	10	2%	13	2%
14	Office	25	39%	198	35%	223	36%
	Business	25	39%	196	35%	221	36%
	Data Proc.	0	0	2	1%	2	1%
16	Technical	9	14%	57	10%	66	11%
	Elect. Tech.	9	14%	57	10%	66	11%
17	Trades and Industry	13	20%	180	32%	193	31%
	Welding	3	5%	14	2%	17	3%
	Auto Body	2	3%	18	3%	20	3%
	Auto Mechanics	0	0	46	8%	46	7%
	Carpentry	6	9%	16	3%	22	3%
	Electronics	2	3%	2	1%	4	1%
	Food Services	0	0	13	2%	13	2%
	Graphic Arts	0	0	29	5%	29	5%
	Machine Shop	0	0	7	1%	7	1%
	Masonry	0	0	6	1%	6	1%
	Painting	0	0	9	2%	9	1%
	Technical Drafting	0	0	14	2%	14	2%
	Refrigeration and Air Conditioning	0	0	6	1%	6	1%
	Total	64		562		626	

Source: Haskell Indian Junior College. Computer printout, April 1976.

C. BIA Adult Vocational Training Program

1. Program Policy and Operation

The intent of the Adult Vocational Training Program as stated in P.L. 84-959 is to "help Indians who reside on and near Indian reservations to obtain reasonable and satisfactory employment."1/ The regulations describe the program as providing "for vocational counseling or guidance, institutional training in any vocational or trade school, . . . apprenticeship and on-the-job training, for a period not exceeding twenty-four months, and for nurses' training, for periods that do not exceed thrity-six months."2/

The AVT program emerged in the late 1950's during a period of Federal Indian Policy that considered relocation and assimilation of Indian people to be priorities. In implementing the program, the Bureau's policies as reflected in its Manual and in practice have been characterized historically by two assumptions: 1) reasonable and satisfactory employment does not and will not exist on or near Indian reservations; therefore, 2) vocational training should take place where one can expect to receive reasonable and satisfactory employment, i.e., urban areas. The relocating of AVT participants found further support in the regulations which state that individuals "may be granted financial assistance to provide for transportation to the place of training, and subsistence during the course of training." 3/ In practice what AVT has meant for a Navajo participant who desired vocational training is that s/he would be sent to an often far away city to receive training appropriate for jobs in that city. Participants were being trained for jobs that supposedly existed in the cities. The rationale was that there were and would be no jobs on the reservation. Labor needs and projections were to be determined by the Employment Assistance counselor located in the city to which the participant was being sent.

There has recently been a shift in Bureau policy about how far people should be sent for training. While the policy is now to train people closer to the reservation, "close" includes places like Salt Lake City, Phoenix, and Denver which can easily be 500 miles or more from a student's home. Table VI-5 shows the locations where students are receiving training. If one accepts Employment Assistance's definition of "close", 81% of the participants are being trained at a location that is close. However, less than 5% of the AVT participants are being trained on or near the reservation. Surely acceptable training opportunities could be found or developed closer to the reservation. (See Chapter IV, Postsecondary Schools.)

1/ P.L. 84-959.
2/ 25 CFR 34, AVT Regulations.
3/ Ibid.

Table VI-6

Breakdown of AVT Participants by Training Location

Location	Number of AVT Participants	Per Cent
Albuquerque *	138	35
Other New Mexico	16	4
Phoenix	39	10
Other Arizona	15	4
Salt Lake	43	11
Other Utah	32	8
Colorado	33	9
Texas	9	2
Oklahoma	3	1
California	33	9
Chicago	9	2
Cleveland	4	1
Haskell	10	3
Other	4	1
	388	100

"close" 81%

*Of the AVT participants receiving training in Albuquerque, 29 or 7% are at SIPI.

Source: Individual files from the following Employment Assistance Offices: Eastern Navajo, Western Navajo, Shiprock, Chinle, Ft. Defiance, Leupp subagency.

The recent shift in Bureau policy is, at this stage, more rhetoric than actual change in practice. The articulated shift may be 1) a recognition that as industrial and natural resources development continues on the reservation, there will be jobs; 2) a recognition that many jobs on the reservation now held by non-Navajos could be held by trained Navajos; and 3) a recognition that the majority of Navajos who desire training also desire to live on or near the reservation. If these hypotheses are accurate, and we hope they are, the Bureau has little information concerning the labor needs on the reservation. The Bureau still relies on state employment security data for labor force projections--a source which has not been a good one for Indian data in general. These data are based on county lines and do not recognize the reservation boundaries for statistical reporting; their reliability has been frequently challenged and the problems are compounded by undercounting. An inaccurate picture of the reservation emerges when data from counties that have diverse on and off reservation characteristics are lumped together.

The other source of data still used by Employment Assistance is a Navajo Manpower study 1/ that describes in general terms the characteristics of the Navajo labor force in 1967 and does little in the way of projecting future employment needs for the reservation. Once again the necessity for the tribe to develop its own labor force data, assuming that the BIA uses it, becomes evident.

Another question raised by the AVT training locations is why more students are not referred to SIPI for vocational training. Given the apparent bias toward off reservation training locations, one would assume that the Bureau would first utilize its own facilities to their maximum potential before sending students to proprietary institutions in other cities. This is particularly true in light of the underenrollment at SIPI. Since there is no cost for tuition, room or board for single students under 26, an AVT applicant could go there without cost, thus freeing up funds for persons who are over 26 or married, and increasing the number of Navajos served. (AVT reports a lengthy list of students applying for funds who cannot be served.)

Using a proprietary institution would be acceptable if SIPI didn't offer the course, but SIPI has a wide range of course offerings, and one would expect far more students to be referred there than is the case. Furthermore, SIPI also represents a major investment of federal resources. To the extent that its enrollment is down, its equipment and facilities are not being put to best use. In light of its national backlog of 2,700 applicants, AVT could eliminate the underenrollment at SIPI and some of its backlog simultaneously. Lack of use of SIPI may be yet another reflection of the absence of a coordinated vocational education policy in the Bureau.

1/ Navajo Manpower Survey prepared jointly by the Navajo Tribe, Indian Health Service, Bureau of Indian Affairs, Arizona State Employment, and Office of Navajo Economic Opportunity, (1969).

Another rationale used by AVT for not training people closer to the reservation is that there are no training facilities close to the reservation. If, over the last sixteen years, AVT had invested a portion of its resources toward developing a vocational training capability on or near the reservation, rather than supporting private training institutions in major urban areas, there might today be comprehensive training sites located on or near the reservation. Building a permanent vocational education infra-structure, with equipment, facilities, and training opportunities could be accomplished in several ways using AVT funds and it is critical for the tribal government to be involved in making these decisions.

Bureau high schools could also be used for on-reservation vocational training. Existing vocational education facilities and capabilities could be enlarged to be used both in the evening and the day for adults as well as high school students, as is common practice in urban vocational schools. Postsecondary institutions on and near the reservation which have the capability and the desire to develop more comprehensive vocational/technical programs, could also be utilized. Interviews were conducted with these institutions, and all expressed an interest and desire to expand their vocational/technical programs. Furthermore, utilizing facilities on and near the reservation would facilitate more responsiveness to training needs as they emerge through industrial and natural resources development on the reservation. Under the present policy, the training programs in urban areas are not compelled to respond to training needs on the reservation or to coordinate with the manpower and education goals of the Navajo Tribe.

2. Use of Community Colleges

Three major reasons were given to explain why community colleges in the Navajo Area have not been used more extensively by AVT: 1) the quality of training at the community colleges is inadequate; 2) students at community colleges are taking general education courses required for the A.A. degree in addition to their vocational courses (AVT legislation only permits students to take vocational courses); 3) community colleges do not cooperate with AVT in providing required follow-up reports on AVT enrollees. Each of these reasons is disucssed below:

a) Quality of Training: Contemporary vocational education theory places extensive emphasis on the use of community colleges for vocational training; and the merits of the community college system have been proven. Arizona maintains one of the most comprehensive community college systems in the country. While this study did not examine the quality of training at Northland Pioneer Community College, there is every reason to believe that the occupational training programs there are properly designed to prepare students for employment. In New Mexico a recent study of postsecondary vocational education has concluded "Post-secondary programs that are avowedly vocational are given in a variety of institutions.... Where these programs exist they tend to be of high quality enjoying a relatively high placement rate. 1/

1/ New Mexico, State of. A Report to the Governor's Council of Economic Advisors, State of New Mexico, from the Committee on Educational and Training Needs for Economic Improvement, December 19, 1975. p. 16.

Under the circumstances it is difficult to understand why AVT questions the quality of community college vocational training. From a financial perspective, sending a student to a local community college is less expensive than sending him or her to a proprietary school in an urban area.

b) General Education Courses at Community Colleges: The Navajo Area Office argued that the Bureau could not use AVT funds in community colleges because students were taking general education courses. This position was based in part on the results of a recent Department of Interior audit of the AVT program which states:

> With regard to the AVT program, we noted that two agencies, with substantial enrollments in community colleges, were allowing program participants to take general education courses and other subjects not directly related to their stated vocational objectives. The enrollment in such courses is in conflict with the BIA manual which states that 'Training programs will be comprised of unit subjects or units of instruction which are of a technical vocational nature related to the training objective and clearly distinguishable from academic subjects associated with general education. 1/

The report further states that "use of AVT funds for general education conflicts with the authorizing legislation which clearly directs this program to be used for vocational training. Consequently, we are recommending that the Bureau stop using AVT for general education. (A higher education grant program is already available.)" 2/

The audit report could be interpreted in two different ways. According to AVT officials in Washington, the audit report is arguing against AVT participants taking any general education courses, even those related to degree programs in vocational/technical education. Such an analysis would mean that an AVT participant could attend a community college only to secure a certificate in a particular occupational area but would not be permitted to pursue a degree in an occupational area because it would include general education courses. The other interpretation is that the audit report is arguing against AVT participants being supported in general education/academic transfer programs geared to prepare them to transfer to four year colleges. The latter interpretation seems more valid, and given the terms of the AVT legislation, the Navajo Area Office is acting properly if it does not allow students to attend community colleges to obtain academic degrees.

If the first interpretation of the audit report is correct, however, we would take strong exception to their Audit Agency's reasoning, as does

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1/ U.S. Dept. of the Interior, Office of Audit and Investigation. Review of Adult Vocational Training and Direct Employment Assistance Programs, Bureau of Indian Affairs (Draft Report), Washington, D.C.: Dept. of Interior, 1976, p. 18.

2/ Ibid.

the Bureau's Central Office. General education courses in math, science, etc., are required for a person to succeed in a particular occupational training program. This has been a recognized need in manpower and vocational training programs for years. Secondly, securing a community college degree in an occupational category not only offers an individual the opportunity for employment, but can also provide the individual with the broader range of skills which will enhance her/his options in the labor market. Arguing that AVT was not intended to support academic programs, and prohibiting students from taking courses in math or science which are an essential part of vocational/technical training makes no sense. If the AVT legislation is not sufficiently flexible to permit this, then serious consideration should be given to modifying the law to allow students to attend vocational technical programs in community colleges. The higher education program is not the answer; there are not sufficient funds to support students seeking two year degrees in occupational programs. Picking up the costs for these students would reduce funds available to those interested in professional training. AVT, or perhaps as it should more appropriately be called in 1976, the Adult Postsecondary Vocational Education Program, should fill this gap, and not only allow, but encourage the participation of students in community colleges where they can develop the broad range of skills.

The Bureau, in its response to the audit indicated that it would continue to use community colleges; therefore, it is difficult to understand why the Navajo Area Office continues to oppose vocational technical programs at local community colleges.

c) Community College Cooperation in AVT Reporting: The Navajo Area Office also argues that the community colleges are uncooperative in providing performance or follow-up reports on AVT enrollees as required by the Bureau. This problem is recognized by the AVT officials in the national office, but they do not conclude that this means that students should not participate in community college programs. In response to a criticism by the DOI Division of Audit of the failure of community colleges to provide student reports, the Bureau stated:

> Our experience has been that community college officials are not sympathetic to our needs and requests, and in fact, many community colleges do not keep progress reports. Many of our counselors have attempted to make arrangements with individual instructors on a case-by-case basis, unsuccessfully for the most part. Several instructors have expressed the opinion that our requirements do not seem appropriate in dealing with adults. To keep adequately informed of the progress of students in the community college system requires almost constant, full-time effort. Indian Education programs in colleges have been extremely helpful, but most community colleges do not have these programs. Overall, we do not feel this is sufficient reason to discontinue use of the community college system and we will continue to enroll students in them. We will, of course, increase our efforts to obtain information regarding student progress. 1/

1/ BIA response to DOI Audit.

The Navajo Area does not appear to accept the position of the BIA Central Office.

3. An Assessment of AVT Effectiveness

Our analysis of the effectiveness of the AVT program has centered around the lack of clear policy and the weaknesses that are derived therefrom. Our attempt to make a definitive assessment of the AVT program was frustrated by the absence of appropriate data and the inconsistencies in the data which have been developed. The Navajo Area Office does not maintain comprehensive data on the AVT program and its participants. In order for our study to secure information concerning AVT participants, the location of their training and the occupations for which they are being trained, it was necessary for our staff to visit each of the individual agency and subagency employment assistance offices and to examine each individual file.

Our frustration with the Bureau reporting system, or rather lack of reporting system, was also expressed in the DOI audit which is highly critical of the information system used by the AVT program nationally. In addition to recommending the standardization of definitions of key terms such as partial completion, completion, and employment or placement, the report recommends more intensive efforts to follow-up on the employment status of AVT participants.

To assist us in assessing the effectiveness of AVT, AVT personnel could provide us with only two very limited investigations into these areas. One took the form of a memorandum from the Acting Area Director for Navajo to the Commissioner of Indian Affairs in response to a direct request for specific information. The memorandum indicates that of 87% AVT trainees, 32% completed or "partially completed" their training; 11% were placed in training related jobs; another 7% were placed in non-training related jobs; twenty-two percent of the trainees discontinued their training without completing. 1/

The second item was an evaluation of the Adult Vocational Training Program undertaken in 1975, by the Navajo Area Employment Assistance Office "to determine whether those persons completing training were employed, what they were earning, and whether there could, in fact, be a benefit in dollars to the U.S. Government as a result of the training." 2/ Utilizing a methodology which is highly questionable, the study collected data on 59 cases, a 10% random sample of 583 AVT case files that showed completions or partial completions in three Area Offices, Navajo, Phoenix, and Albuquerque. Statistically, there is no way that such a sample can provide reliable information. In a universe of 500, a sample size of 83 will yield reliability of $\pm$ 10 percent. To achieve a more acceptable + 5 percent level of confidence, a sample size of 222 out of 500 would be required. Additionally, no cases of dropouts from the program were included in the universe. Such a study could not possibly produce valid results.

1/ Source: Memorandum from Acting Area Director to Chief, Division of Job Placement and Training, April 2, 1976.

2/ U.S. Dept. of Interior, Bureau of Indian Affairs, Navajo Area Office. Adult Vocational Training Graduate Survey, 1975.

Recognizing the inherent weakness of the study's methodology, it stated the finding that:

> Based on the expanded sample, of the 583 persons completing the program, 381 or 64% were currently employed; an additional 108 were not employed; and 104 were no longer members of the labor force. 1/

Not only are the data and the findings invalid, the survey makes no attempt to deal with key aspects of the AVT program, e.g., the extento to which people were employed in those areas in which they were trained, the location of their employment, whether employment was full-time or part-time, and whether persons were satisfied with their training or their subsequent employment.

It is difficult to tolerate the absence of a comprehensive evaluation of the AVT program which has such important objectives, has been so controversial and has distributed such large amounts of funds. It is equally hard to understand why an effective management information system with clear definitions has not been set in place and monitored. It also adds an ironic note that the unwillingness of Navajo Area AVT to utilize the community colleges is because, the community colleges did not collect "adequate data."

4. Conclusion

The Adult Vocational Training Program, funded at better than $3.0 million dollars, is clearly one of the most important sources of vocational education monies presently available on the Navajo reservation. There is no question that up to this time these resources have not been used to produce maximum benefits to the individuals or the tribe. The Bureau, through a clarification of its own policy and operating procedures and better program implementation, can go far toward improving the program. If the tribe chooses to contract the program under Self-Determination, the program could be redesigned to more effectively meet tribal needs. We would note in particular that the Self-Determination regulations do not bind tribes to the program guidelines articulated in the Bureau Manual. Therefore, the restrictions discussed in the Audit Report need not apply to a tribe that contracts this program. Furthermore, the regulations governing AVT can be waived if a tribe believes that the regulations are in conflict with its program goals and objectives. Only the AVT law is inviolable under the Self-Determination Act, and as we indicated previously, the law itself could and should be amended if it does not allow the tribe sufficient flexibility to meet the real needs of its people.

D. BIA Career Development Program

The Navajo Area was selected by the Bureau to initiate two Pilot Career Development Centers at Shiprock, New Mexico, and at Tuba City, Arizona.

1/ Ibid.

The purpose of these Centers is to unnite the services of Adult Education, Higher Education, Adult Vocational Training, On-the-Job Training, direct employment and other employment and education programs into a Career Development Program administered by Employment Assistance.

By combining these services under one program, students "for the first time anywhere, are able to obtain complete counseling services at each center which include: diagnostic analysis of job strengths, abilities, career exploration, job information, and placement of training". 1/ The Career Development Center is designed as a client-centered program that allows a person to determine his/her abilities and interests in order to make an intelligent career choice. Once the choice has been made, the person is either referred to Employment Assistance for actual job placement or is referred to AVT or Higher Education for further educational or vocational training to meet his/her career objectives. Figure 1 presents the Career Development Center Model Concept in graphic terms.

In theory the concept of the Career Development Program is an excellent one. Several problems have arisen in the implementation of the concept.

The various programs identified as being part of the Career Development system are not all effectively coordinated into the system. The BIA Higher education program, for example, is operated under contract by the tribe, and as yet, no agreement for programmatic coordination between the tribe's Higher Education program and the Bureau's Career Development Program has been defined.

The tribal Employment and Training Program (NOETA) is also not linked into the Career Development Program. This is of special concern because there is presently a waiting list for the Adult Vocational Training Program, and the tribal CETA program is a possible alternative to AVT for vocational training; without proper program coordination, however, there is no alternative. The problem of coordination between the Bureau and the tribe is one which has overwhelming significance. One example is the absence of the names of tribal education and employment and training staff from the acknowledgements section of the Staff Training Handbook, Career Development Center Project. Staff members of the two tribal divisions which plan and manage programs that are essential to the success of the Career Development effort were obviously not involved.

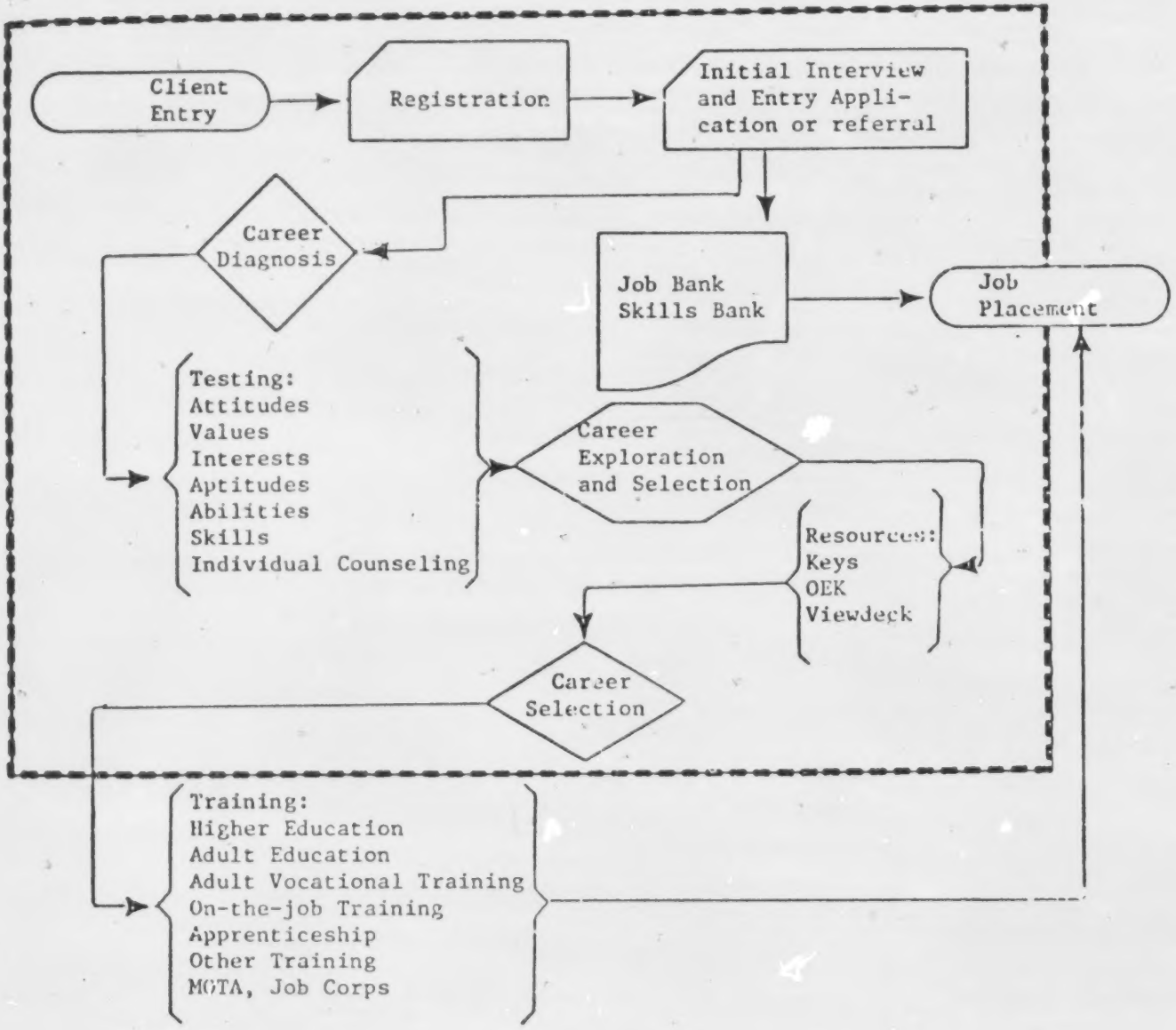
The problems of developing and implementing the system are without a doubt a reflection of the hostility and distrust which exists between the tribe and the Bureau. These feelings are very real and much of the hostility of the tribe toward the Bureau is undoubtedly warranted. The Bureau's attitude reflects a fear of growing tribal control over reservation life; this development has not been accepted as a tribal right by many Bureau personnel who still operate with a paternalistic mentality. When the hostility results in poorly planned and coordinated programs on the reservation, however, it is the members of the Navajo Tribe who suffer. As long as the BIA retains major

1/ Staff Training Handbook, Career Development Center, Navajo Pilot Project.

Figure 1

CAREER DEVELOPMENT CENTER MODEL

Navajo Pilot Project



Source: Staff Training Handbook, Career Development Center, Navajo Pilot Project.

responsibility for the operation of programs on the reservation, there must be a functional working relationship between the tribe and Bureau. The Bureau controls too many resources to be ignored or allowed to operate without strong tribal input.

The relationship between the tribe and Bureau must be based on the principle of self determination. Basic planning and program decisions should be made by the tribe with the assistance of the Bureau as requested by the tribe. It must be clear, however, that it is the responsibility of the tribe to assure that there is coordinated planning and program development; the Bureau apparently will just not implement such coordination of its own. Until this happens positive concepts, such as the Career Development, whoever creates them, will not result in the quality of services that the Navajo people deserve.

E. Bureau of Indian Affairs: Summary and Conclusion

The lack of Bureau policy concerning vocational education at the secondary schools has left BIA high schools with no Bureau or federal funds for vocational education. This lack of policy has left each individual school to its own devices to initiate vocational programs, with no information, no data, and no technical assistance. Lack of Bureau policy and the absence of vocational education personnel with planning responsibility has resulted in a lack of initiative to insure that BIA students have access to public school vocational education programs and a meager vocational education program at the BIA secondary school level. By its inaction the Bureau has effectively eliminated vocational education as an option for Bureau secondary students.

The lack of policy with regard to postsecondary vocational education is also a reality in the Bureau. It is reflected in the Bureau's budget which does not recognize the fact that it administers postsecondary institutions and does not include a specific line item for postsecondary institutions, thus placing the responsibility of providing funds under two Area Office's (Albuquerque and Anadarko) "education budget." 1/ Each institution functions autonomously with little accountability and with little knowledge of what the other is doing. In some cases the two institutions compete for the same students rather than complementing each other's program in an effort to provide the very best service. The result is significant underenrollment at the Bureau's major vocational/technical center and little linkage between these institutions and the Adult Vocational Training Program.

The Adult Vocational Training Program suffers from a law and regulations which are outdated. The Bureau manual which is in no way legally binding defines operating policies for the program. The application of the manual

1/ A memorandum to Area Directors dated June 18, 1976 transfers line authority for the postsecondary institutes from the field office to the Office of Indian Education Programs and establishes a Division of Post-Secondary Education.

by Bureau personnel is inconsistent and often used arbitrarily to justify self-serving program decisions. The Adult Vocational Training program must recognize that the era of paternalism, termination and assimilation have ended and move into the age of self-determination.

Funded at better than 3.0 million dollars, AVT is one of the most important resources for vocational education on the Navajo reservation. These resources have simply not been used to produce maximum benefits to the individuals or the tribe in the past. The Bureau, in full and on-going consultation with the Navajo Tribe, must clarify its own policy and operating procedures linking AVT into a comprehensive vocational education and training policy and program.

Until there is national attention focused on the problems and issues of vocational education at the secondary and postsecondary level in the BIA, there is little hope for significant change. Such attention must be demanded not only by the Navajo Tribe, but all other tribes with a concern for the opportunities available to them and their children to secure meaningful vocational training.

Chapter VII

The Relationship of Vocational Education Courses and Enrollment to Labor Market Needs

Up to this point, this report has focused on the program and funding decisions made at the local, state and federal levels of the vocational education bureaucracy. This section is an examination of the results of that process and those decisions: the vocational education courses offered in secondary and postsecondary schools, and the Navajo enrollment in those courses.

Participation in vocational education has a variety of dimensions, including such activities as career guidance and counseling, career exploration, and skill training that will lead to employment. The most important activity for the Navajo student is vocational training that facilitates the acquisition of skills necessary to obtain employment. This section will, therefore, analyze vocational education programs available to prepare Navajo students for employment. Vocational education programs preparing students for employment and the Navajo enrollment in agriculture, sales, health, business and office, technical, and trades and industry courses will be examined.

A. The Labor Market

In order to determine the relevance of the present vocational education programs and course offerings, one must first determine the potential employment opportunities available to those taking the courses. This section begins with an examination of the employment, by occupation, of Indians and non-Indians in the counties on and near the reservation, 1/ utilizing 1970 Census data 2/, and a survey of Navajo/non-Navajo employment in Business/Service Industries on the Navajo reservation conducted by the Office of Program Development of the Navajo Tribe. 3/ Attention is given to those occupations that require skill training where can be obtained through vocational/technical courses and programs. Efforts to

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1/ Counties include: Apache, Navajo, Coconino in Arizona; McKinley, San Juan, Valencia, Rio Arriba, Sandoval in New Mexico, San Juan in Utah.

2/ 1970 Census Data available through a special computer run provided by the Navajo Research and Statistics Center, Navajo Tribe, Window Rock, Arizona.

3/ Employment of Navajos and Non-Navajos in Business/Service Industries on the Navajo Reservation, Office of Program Development, Navajo Tribe, Window Rock, Arizona.

provide projections of expanding occupations on the reservation based on planned economic development are also underway in the Office of Program Development; these data were not available in time to be included in this study.

Indians comprise approximately 35% of the total population in the counties on or near the reservation and close to 100% of the population on the reservation itself. However, Indians comprise only 23% of those employed on and near the reservation (Table VII-3) and 62% of those employed on the reservation itself (Table VII-4). Using the 1970 Census information and the Industries Survey, we can determine the occupations that were filled by non-Indians. These are jobs Navajos compete for, and could move into if they had appropriate training.

It is important to keep the issue of Indian preference in mind when examining Navajo employment on and near the reservation. The Tribe, through its Office of Navajo Labor Relations, has been exercising its legal authority to require employers on the reservation to give Indians preference in hiring, and requiring that specific goals and time tables for the employment of Navajos be included in agreements between the Tribe and reservation employers. In addition, the Bureau of Indian Affairs and the Indian Health Service are required by law to give preference to Indians in their hiring. Finally, the Department of Labor recently proposed regulations which allow employers near the reservation to offer preference to Indians without violating equal employment requirements. This provision further extends the opportunity for Indian tribes to secure their fair share of the employment market near the reservation, and makes the analysis of the presence of non-Indians in jobs on and near the reservation even more important. In light of these special circumstances, 35% of the total employment which is the percentage of Navajo population in the counties on and near the reservation, will be used as a measure to determine whether Navajos are properly represented in particular segments of the labor market; 90% is the figure that would seem appropriate on the reservation.

Table VII-3 shows the percent Indian employed in the occupations on and near the reservation. Those occupations for which skills can be obtained through vocational training are marked with an asterisk. In only two instances do Indians represent more than 35% of those employed in occupations that require vocational/technical training: carpenters (44%) and health service workers (47%). In every other occupational area, they comprise less than 35% of those employed.

As one might expect, Indians have the highest employment in those occupations which do not require extensive preparation or training, e.g., laborers, both farm and non-farm, private household workers, and certain operatives.

A summary of the Business/Service Industry Survey shows the occupations presently being held by Navajos and non-Navajos. Startling is the fact that Navajos comprise only 62% of the labor force <u>on the reservation</u> (Table VII-4). Again, the occupations where Navajos comprise a low

percentage of the employed include occupations that Navajos could fill if appropriately trained in vocational and technical programs.

Table VII-3, taken from Arizona's State Plan, shows those occupations in which the projected expansion and replacement needs for the state in 1976 and 1980 is at least 1,000 less than the number who will be completing vocational training.

The relevance of courses offered in the secondary and postsecondary institutions is analyzed in relation to the available labor market data. Data from the courses and enrollment in public secondary schools on the reservation (Tables VII-4 and VII-5), in BIA high schools (Table VII-6), and in postsecondary institutions and programs (Table VII-7) are utilized.

B. Analysis of Courses and Enrollment

1. Distributive Education. 1/

The 1970 Census data indicate that Navajos account for only 3% of those employed in retail trades on and near the reservation. 2/ On the reservation itself, Navajos comprise 70% of those employed in sales occupations. 3/ Arizona's State Plan, Table 3 (our Table VII-5) indicating the employment opportunities related to vocational education programs indicates that the number likely to be trained through vocational education in marketing and distribution will fall far short of the projected expansion and replacement need. 4/

No courses in distributive education are offered in the reservation secondary schools in Arizona or the BIA schools; (See Table VII-6 and Table VII-8). In New Mexico, (Table VII-7), three of the seven secondary school districts offer distributive education courses, but very few Indian students are enrolled in these courses. Of the Indians enrolled in secondary school vocational education courses on and near the reservation in New Mexico, only 1% are enrolled in distributive education. The postsecondary institutions (Table VII-9) offer a few distributive education courses, but again, the enrollment of Indians is low, only 2%.

1/ For example, Advertising, Food Services, Retail Trade, General Merchandising, Recreation and Tourism.

2/ 1970 Census

3/ Navajo Tribe, Office of Program Development, Business/Service Industry

4/ Arizona State Plan (Table 1)

Greater emphasis is needed to provide more distributive education courses and to encourage Navajo students to participate in them.

2. Health Occupations

Although Indians account for 47% of the health service workers on and near the reservation, they comprise less than 1% of the medical and health technicians (excluding practitioners) which require more extensive technical training and are compensated with significantly higher salaries. We estimate that according to present employment data, there is a demand for more than 100 Navajo health technicians on the reservation. The Arizona State Plan employment opportunities data also project that the vocational education output of certain health technicians will not meet the expansion and replacement needs for the years 1976-1980.

The secondary schools offer very little training in the health occupations. Three school districts in New Mexico and one Bureau high school offer health occupations courses. There are no health occupations courses in Arizona secondary schools. The state-supported post-secondary institutions also offer very limited training. The widest range of courses in health is offered by Navajo Community College where the enrollment in these courses accounts for 25% of the total vocational enrollment (80 persons). Nine percent of the AVT participants are receiving training in health occupations; however, none of these are in training on or near the reservation.

An expansion of courses in the health occupations is warranted for Navajos to obtain the training necessary to compete for those jobs presently being held by non-Navajos and to meet future needs.

3. Agriculture

The projections of labor needs in agriculture vary greatly depending on the source of the data. Future needs depend on several variables, but the present employment in agriculture reveals that Indians comprise 29% of those employed as farmers and farm managers on and near the reservation and 95% of the farmers on the reservation itself. More important is the fact that, be they Indian or non-Indian, there are only 907 farmers and farm managers on or near the reservation, which account for only 1% of all those employed. Of the few jobs that are available, Indians are presently well represented in agricultural occupations. Additionally, Arizona's State Plan data indicate that the needs in agricultural occupations will be met by the present vocational education output.

High expectations have been voiced for the creation of numerous employment opportunities as a result of the Navajo Indian Irrigation Project. In a report prepared for the Navajo Community College for development of the Comprehensive Employment Opportunity Center which was originally to be located in Shiprock, Dr. Joel Price estimated:

In full operation, the Navajo Indian Irrigation Project will employ about 2,000 workers in farming and at least 1,000 in feed lot, transport, processing and related operations. Considerably higher employment levels have been presented in various releases, but . . . it seems more fitting to use the more conservative figure of a total of 3,000 employees of the Navajo Indian Irrigation Project and processing and related operations. 1/

The Four Corners Regional Commission estimated that "approximately 2,400 jobs will be created during the peak seasonal employment period."2/ On the other hand, Table VII-1 shows that agricultural sector employment as a percent of total employment has decreased significantly since 1950 in each of the four states that comprise the Four Corners Region, as has been the case nationally as well.

Table VII-1

Agricultural Sector Employment as Percent of Total Employment in U.S. and Four Corners Region Selected Years 1950-1968

	U.S.	FCR	Arizona *	Colorado *	New Mexico *	Utah*
1950	11.6	20.0	22.0	20.8	15.8	25.3
1959	7.6	10.4	10.1	12.4	6.1	17.2
1970	4.3	5.8	9.6	6.8	3.6	7.2

In the U.S., employment in the agricultural sector has decreased from 11.6% in 1950 to 4.3% in 1970. In the Four Corners Region, the decrease has been from 20.0% to 5.8% during the same period of time.

Table VII-2 shows actual employment in the agricultural sector in 1970 and forecasts what the employment will be in 1980. Only New Mexico's Northwest Subregion (McKinely, Sandoval and San Juan Counties) shows an

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1/ Price, Joel. Comprehensive Employment Opportunity Center, Shiprock, New Mexico, Shiprock, New Mexico; Navajo Community College, June 30, 1974.

2/ U.S. Department of Commerce. Development Plan: Four Corners Regional Commission, Washington, D.C.;, February 1972.

* Four Corners Region portion of state.

Source: U.S. Department of Commerce, Development Plan: Four Corners Regional Commission, Washington, D.C., Feburary 1972.

increase from 3.6% to 5.2% agricultural employment. Both Arizona and Utah and the Sub-regions that encompass the reservation show a decline of 3.3% in agricultural employment.

Table VII-2

Summary of Agricultural Employment Forecasts
Four Corners Region 1970-1980

Area	Agri-cultural Employment	Ag. Employment as Percent of Total Employment	Agri-cultural Employment	Avg. Annual Percent Change (1970 - 1980)
Arizona: Northern Subregion 1/	700	1.7	500	-3.3
New Mexico: Northwest Subregion 2/	1,200	3.6	2,000 3/	5.2
Other Subregion	6,700	10.3	4,500	-3.9
Utah: Non-SMSA Subregion	5,300	10.8	3,800	-3.3
Total Region	40,600	5.8	32,300	-2.3

1/ Apache, Navajo, and Coconino counties.
2/ McKinley, Sandoval and San Juan Counties
3/ Includes agricultural employment on the Navajo Indian Irrigation Project of 1,200 and 1980.

Source: Four Corners Regional Commission, Development Plan, Agricultural Addendum, U.S. Department of Commerce, June 1973.

Whatever projections one might choose to use, none warrant the plethora of agricultural courses provided at the secondary level in both Arizona and New Mexico. In Arizona and New Mexico, 46% and 41% respectively of the Indian enrollment in secondary vocational education is in agricultural courses.

As was pointed out, Indians are presently well represented in agricultural employment. Whatever the expansion in agriculture from the Irrigation Project, there is little hope that all those being trained will find employment in the agricultural occupations. Among the courses

offered, few are in agricultural mechanics or in agricultural production, the occupations most likely to be in demand if the vast expansion of agricultural employment does indeed occur.

4. Office Occupations

In the clerical occupations, Indians presently account for 21% of those employed on and near the reservation and 65% of those employed on the reservation itself. According to Arizona's State Plan, the present vocational education output in the office occupations will not meet expansion and replacement needs.

Based on the present and future needs, employment opportunities in the clerical occupations do exist and will continue to be in demand. Examination of the courses and the enrollment of Indians in the courses indicate that Indians are being trained at both the secondary and postsecondary level for employment in this field. There will be a continuing demand for persons trained in these occupations and courses in office occupations should continue to be provided.

5. Technical Occupations 1/

The employment of Indians in technical occupations both on and near the reservation is small (forty-eight percent on the reservation and 14% on and near the reservation). Some of these positions require professional education, but many are jobs which require vocational/technical training.

As is the case nationally, there is no technical training provided at the secondary level, and thus, such training must be found at the postsecondary level. The course offerings in technical occupations at the postsecondary institutions are very limited; only 12% of the Navajos (77) enrolled in postsecondary vocational training are participating in technical training. At this rate of training, one can expect that the better paying technical jobs will continue to be filled by non-Navajos unless greater emphasis is placed on providing more technical programs and encouraging Navajos to participate in them.

The technical courses presently offered and the number of Indians enrolled at the postsecondary level include:

1/ For example, Engineering Related Technology, (Mechanical, agricultural, environmental, etc.), Police-Science Technology.

Computer Programming	29
Engineering aides	5
Electronics	25
Mining Technicians	1
Electro Mechanics	2
Home Ec. Related Techno.	1
Other	14

Our data indicate that there is presently a demand for 20 or more technicians in each of the following: engineering, metalurgical, mining and other technologies.

6. Trades and Industry 1/

The vocational education directors in secondary and postsecondary schools on and near the reservation who were interviewed as part of this study were nearly unanimous in stating that it did not matter how decisions were made as to what training was offered to students, since there were, in fact, no jobs. This simply is not so. There are jobs; but the reality is that they are being filled to far too great an extent by non-Navajos. This is vividly the case in the employment of craftsmen. Seventy-seven percent of the craftsmen on and near the reservation and 41% of the craftsmen on the reservation are not Indians.

Enrollment in trades and industry occupations at the secondary level shows that 30% of the Indian students enrolled in vocational education in New Mexico and 25% of the students in Arizona are training for these occupations. However, in order to identify the occupations within the trades and industry program students are being trained for, it is necessary to analyze the enrollment and courses specifically.

Our data indicate that there is a demand for construction craftsmen, particularly plumbers, pipefitters, electricians, excavating and grading machine operators and carpenters, as many as 100 in each classification. In addition, there is a demand for mechanics and repairemen in all classifications except auto mechanics for which there is only a small demand, about 20.

Tables VII-10 and VII-11 break out the specific courses and enrollment for Arizona and New Mexico secondary schools. Thirty-two percent of the students in Arizona, and 12% in New Mexico enrolled in trades and industry programs are participating in courses in Automotive Services, the one area for which there is apparently little demand. Seventeen percent of the students in Arizona and 44% in New Mexico are participating in construction and maintenance trades; the high enrollment in New Mexico is almost entirely accounted for by the students in one school district,

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1/ For example, Air Conditioning, Automotive, Aviation, Construction and Maintenance, Electrical Metalworking.

Gallup/McKinley. The other New Mexico districts have only limited course offerings. Even with the extensive training offered in the Tribal CETA program, craftsmen are likely to be in continuous demand on the reservation. Any economic development on the reservation is likely to expand the existing demand for skilled tradesmen.

Of other occupations within trades and industry for which courses are offered, most do not provide enough courses in sequence to enable a student to obtain more than an introduction to the skills necessary for employment or apprenticeship.

At the postsecondary level, 40% of the students are participating in training in trades and industry occupations. But again, we find a high enrollment in automotive services; at Northland, 18% of the students in trades and industry are in automotive services, 40% are in the same course at Navajo Community College, and 11% of the students in the AVT program.

Only at Northland Pioneer Community College are the number of course offerings and number of students enrolled of significance in the areas of carpentry and plumbing. There are almost no other trade and industry courses, and the enrollment of Navajo students in training for which there are jobs remains very low. Training for trades and industrial occupations must be given more emphasis if Navajos are to be able to qualify for employment in the occupations most likely to be expanding in demand on and near the reservation.

C. Summary

This analysis of the relationship of the present course offerings on and near the reservation indicates that a thorough review of programs is warranted, with particular emphasis on the jobs which Navajos can fill on the reservation, and building a labor pool for jobs which are likely to become available in the future both on and near the reservation. Special emphasis must be given to the distributive education, health, technical, and trade and industrial categories.

The issue for secondary schools is twofold. First, they must offer courses which are not now available in such fields as distributive education and trades and industry to prepare Navajos for employment. Secondly, secondary schools must offer Navajo students appropriate exposure to such technical programs at the secondary level so that they are informed of all their options when they consider postsecondary training.

Table VII-3

Employment of Whites and Indians on and Near the Reservation

	TOTAL	WHITE	INDIAN	PERCENT INDIAN
PROFESSIONAL, TECHNICAL AND KINDRED WORKERS:	14,157	12,046	2,003	14.2
Engineers, Technical	906	804	62	6.8
Physicians, Dentists, and related Practioners	467	463	4	0.9
Medical and Other Health Workers, Except Practioners	948	691	257	0.4
Teachers, Elementary and Secondary Schools	4,997	4,474	472	9.4
Technicians Except Health	1,255	949	292	23.3
Other Professional Workers	5,584	4,629	916	16.4
MANAGERS AND ADMINISTRATORS, EXCEPT FARM:	8,073	7,315	734	9.1
Salaried: Manufacturing	317	285	32	10.1
Retail Trade	1,410	1,366	44	3.1
Other Industries	4,315	3,721	570	13.2
Self-Employed: Retail Trade	1,119	1,065	54	4.8
Other Industries	912	878	34	3.7
*SALES WORKERS:	4,133	3,699	386	9.3
*Manufacturing and Wholesale Trade	527	525	2	0.4
*Retail Trade	2,816	2,449	329	11.7
*Other Workers	790	725	55	7.0
*CLERICAL AND KINDRED WORKERS:	12,691	9,833	2,713	21.4
*Bookkeepers	1,582	1,499	80	5.1
*Secretaries, Stenographers, and Typists	3,201	2,534	643	20.1
*Other Clerical Workers	7,908	5,800	1,990	25.2
*CRAFTSMEN, FOREMEN, AND KINDRED WORKERS	12,199	9,008	2,833	23.2
*Automobile Mechanics and Body Repairmen	1,261	1,021	216	17.1
*Mechanics and Repairmen, Except Auto	1,562	1,238	306	19.6
*Machinists	250	208	42	16.8

*Source: 1970 Census produced by Navajo Research and Statistics Center, Navajo Tribe.

Table VII-3 (cont'd)

	TOTAL	WHITE	INDIAN	PERCENT INDIAN
*Metal Craftsmen, Except Carpenters Mechanics & Machinists	213	203	10	4.7
*Carpenters	1,284	696	570	44.4
*Construction Craftsmen, Except Carpenters	2,663	2,006	630	23.7
*Other Craftsmen	4,966	3,839	1,059	21.3
OPERATIVES, EXCEPT TRANSPORT:	8,964	5,963	2,911	32.5
Durable Goods, Manufacturing	2,081	810	1,229	59.1
Non-Durable Goods, Manufacturing	963	564	393	40.8
Non-Manufacturing Industries	5,920	4,589	1,289	21.7
*TRANSPORT EQUIPMENT OPERATIVES:	1,972	1,677	258	13.1
*TRUCK DRIVERS:	2,297	1,782	367	16.0
LABOR, EXCEPT FARM:	5,208	2,849	2,248	43.2
Construction Laborers	1,273	184	463	36.3
Freight, Stock and Material Handlers	1,226	805	386	31.5
Other Labors, Except Farm	2,709	1,260	1,399	51.6
*FARMERS AND FARM MANAGERS:	907	647	260	28.7
FARM LABORS AND FARM FOREMAN:	1,193	689	504	43.3
Farm Laborers, Unpaid Family Workers	70	36	34	48.6
Farm Laborers, Except Unpaid and Farm Foreman	1,123	653	470	41.9
SERVICE WORKERS, EXCEPT PRIVATE HOUSEHOLD:	12,294	7,966	4,075	33.2
Cleaning Service Workers	3,021	1,837	1,078	35.7
*Food Service Workers	4,259	3,011	1,158	27.2
*Health Service Workers	1,087	563	508	46.7
Personal Service Workers	1,694	1,132	549	32.4
*Protective Service Workers	1,106	820	281	25.4
Service Workers, Except Private Household	1,127	603	501	44.5
PRIVATE HOUSEHOLD WORKERS:	1,377	598	690	50.1
TOTAL	85,465	64,072	19,982	23.4

*Source: 1970 Census provided by Navajo Research and Statistic Center, Navajo Tribe.

Table VII-4

Survey of Navajo and Non-Navajo Employment in Business/ Service Industries on the Navajo Reservation*

	TOTAL	NAVAJO	NON-NAVAJO	% NAVAJO
PROFESSIONAL TECHNICAL AND KINDRED WORKERS	7687	3655	4032	47.5
Technical Workers	1010			
Engineering, Technicians	72			
Mining and Metallurgy	212			
Other Technicians Except Health	351			
Health Technicians	275			
MANAGERS	2003	761	1242	38.0
*SALES	637	446	191	70.0
*CLERICAL	5805	3753	2052	64.7
*Typists, Secretaries & Clericals	4544			
Telephone Operator	42			
Mail Carriers	525			
Cashiers	74			
Postal Clerks	620			
*CRAFTSMEN, FOREMEN, AND KINDRED WORKERS	3596	1408	2188	39.2
Automobile Mechanics & Body Repairmen	87			
Mechanics and Repairmen, except auto	804			
Machinists	50			
Metal Craftsmen, except carpenters, Mechanics and Machinists	57			
Construction Craftsmen	1135			
Carpenters	425			
Excavating Grading Machine Operator	255			
Painter and Paper Hanger	160			
Electrician	162			
Plumber & Pipe Fitters	133			
Linemen and Servicemen	149			
Other Craftsmen	1314			
OPERATIVES	1562	1514	48	96.9
*TRANSPORTATION WORKERS	81	72	9	88.9
*TRUCK DRIVERS	522	179	343	34.3
SERVICE WORKERS, EXCEPT PRIVATE HOUSEHOLD	3776	3561	215	94.3
LABORERS	1589	1496	7	94.1
*FARMERS	147	139	8	94.6
TOTAL	27,405	16,984	10,421	62.0

*SOURCE: Office of Program Development, Navajo Tribe, Window Rock, AZ.

Table VII-5

Employment Opportunities Related to Vocational Education Programs
Labor Demand and Supply Summary

State of Arizona

Fiscal Year Ending June 30, 1976

OE Code	Instructional Program	Current Employment	Projected Expansion and Replacement Needs		Projected Labor Supply			
					Vocational Education Output		Other Sectors Output	
		1975	1976	1976-1980	1976	1976-1980	1976	1980
4.0600	Food Distribution*	7,665	486	2,430	25	138		
4.0700	Food Services*	4,865	378	1,890	102	560		
4.0800	General Merchandising*	61,165	5,189	25,945	1,230	6,828		
4.1100	Hotel & Lodging*	2,525	331	1,655	53	295		
4.1900	Transportation	10,940	638	3,190	270	1,440		
7.0203	Medical Lab. Technology*	2,060	253	1,265	25	188		
7.0301	Nursing (RN)*	12,380	1,372	6,860	400	2,250		
7.0302	Practical Nursing*	2,490	331	1,655	150	1,125		
7.0303	Nursing Assistant*	7,720	847	4,235	400	3,500		
9.0201	Care and Guidance of Children*	5,065	6,890	8,309	2,074	11,668		
9.0202	Clothing Management, Production and Services*	9,260	5,802	7,010	1,142	5,825		
9.0203	Food Management, Production and Services*	40,355	15,964	19,256	1,600	8,160		
9.0204	Home Furnishings Equipment & Services*	1,025*	1,871	7,381	372	1,898		
9.0205	Institutional and Home Management and Services*	32,260	6,224	7,498	431	2,198		

Table VII-5 (cont'd)

Employment Opportunities Related to Vocational Education Programs
Labor Demand and Supply Summary

State of Arizona

Fiscal Year Ending June 30, 1976

OE Code	Instructional Program	Current Employment	Projected Expansion and Replacement Needs		Projected Labor Supply			
					Vocational Education Output		Other Sectors Output	
		1975	1976	1976-80	1976	1976-1980	1976	1980
4.0100	Accounting and Computing Systems Occupations	39,800	3,772	18,860	1,000	12,500		
4.0400	Information Communication Occupations	18,990	1,734	8,670	900	5,425		
4.0500	Materials Support, Transportation, etc.	10,000	676	3,380	175	975		
4.0800	Supervisory and Adm. Management Occupations	9,585	687	3,435	115	788		
6.0199*	Engineering, Related Technical, Other	3,155	268	1,340				
16.0699	Miscellaneous Tech. (Other)	6,260	426	2,130				
17.0100	Air Conditioning*	2,915	288	1,440	110	575		
17.0200	Appliance Repair*	2,180	176	880	20	100		
17.1001	Carpentry*	14,125	1,257	6,285	310	1,900		
17.1002	Electricity*	7,425	617	3,085	45	263		
17.1003	Heavy Equipment*	15,425	1,009	5,045	75	400		
17.1004	Masonry*	4,225	358	1,790	50	275		
17.1005	Painting & Decorating*	5,100	438	2,190				
17.1007	Plumbing & Pipe Fitting*	5,445	476	2,380	85	463		
17.1099	Construction & Maint. Trades (Others)*	15,875	1,192	5,960	325	1,813		
17.2300	Metalworking*	18,690	1,113	5,565	525	2,688		
17.2900	Quantity Foods*	24,580	1,979	9,895	175	1,063		
17.3100	Small Engine Repair*	2,115	110	550				

*Data incomplete--only one category of workers available. Source: Arizona State Plan for Vocational Education, 1975-76.

Table VII-6

Arizona Reservation School Districts
Vocational Education Courses and Enrollment 1975-76

	# of Courses	# of Classes	# of Indian Students	% of Tot Indian Students
AGRICULTURE				
Window Rock	2	3	34	
Ganado	0	0	0	
Chinle	5	9	173	
Tuba City	4	4	116	
Monument Valley	4	4	78	
Page	0	0	0	
			401	41%
DISTRIBUTIVE				
Window Rock				
Ganado				
Chinle				
Tuba City				
Monument Valley				
Page				
HEALTH				
Window Rock				
Ganado				
Chinle				
Tuba City				
Monument Valley				
Page				
HOME EC. OCCUP.				
Window Rock	1	1	18	
Ganado	1	1	12	
Chinle	0	0	0	
Tuba City	0	0	0	
Monument Valley	0	0	0	
Page	1	1	12	
			42	4%
OFFICE				
Window Rock	5	6	115	
Ganado	2	3	59	
Chinle	3	5	63	
Tuba City	2	2	27	
Monument Valley	2	2	21	
Page	3	3	16	
			301	31%
TRADES & INDUSTRY				
Window Rock	6	6	52	
Ganado	3	3	45	
Chinle	2	2	31	
Tuba City	4	4	17	
Monument Valley	4	4	48	
Page	7	7	35	
			228	23%
GRAND TOTAL			972	

SOURCE: Arizona Department of Career and Vocational Education.

NOTE: No technical courses are offered on the secondary level.

Table VII-7

New Mexico School Districts

Vocational Education Courses and Enrollment 1975-76

	# of Courses	# of Classes	# of Indian Students	% of Tot Indian Students
AGRICULTURE				
Gallup	3	3	255	
Central	1	8	152	
Dulce	1	6	65	
Cuba	0	0	0	
Aztec	2	6	16	
Farmington	1	3	5	
Bloomfield	1	3	2	
			495	46%
DISTRIBUTIVE				
Gallup	11	11	9	
Central	1	1	0	
Dulce	0	0	0	
Cuba	0	0	0	
Aztec	0	0	0	
Farmington	11	12	6	
Bloomfield	0	0	0	
			15	1%
HEALTH				
Gallup	1	1	9	
Central	2	2	35	
Dulce	0	0	0	
Cuba	0	0	0	
Aztec	0	0	0	
Farmington	1	1	2	
Bloomfield	0	0	0	
			46	4%
HOME EC. OCCUPATIONS				
Gallup				
Central				
Dulce				
Cuba				
Aztec				
Farmington				
Bloomfield				
OFFICE				
Gallup	3	10	129	
Central	2	2	37	
Dulce	2	2	6	
Cuba	1	1	14	
Aztec	1	1	2	
Farmington	2	2	3	
Bloomfield	5	5	8	
			199	18%
TRADES AND INDUSTRY				
Gallup	14	24	233	
Central	2	2	44	
Dulce	0	0	0	
Cuba	0	0	0	
Aztec	2	4	36	
Farmington	2	4	5	
Bloomfield	1	1	3	
			321	30%
GRAND TOTAL			1076	

Table VII-8

Vocational Education Courses and
Enrollment in BIA Schools, 1976-75

	# of Courses	# of Classes	# of Indian Students	% of Tot Indian Students
AGRICULTURE				
Wingate High School	1	1	8	
Many Farms High School	2	2	49	
Phoenix Indian School	0	0	0	
Albuquerque Indian School	0	0	0	
			57	11%
DISTRIBUTIVE				
Wingate High School	0	0	0	
Many Farms High School	0	0	0	
Phoenix Indian School	0	0	0	
Albuquerque Indian School	0	0	0	
			0	
HEALTH				
Wingate High School	0	0	0	
Many Farms High School	1	1	4	
Phoenix Indian School	0	0	0	
Albuquerque Indian School	0	0	0	
			4	0.8%
HOME EC. OCCUPATIONS				
Wingate High School	0	0	0	
Many Farms High School	1	2	40	
Phoenix Indian School	0	0	0	
Albuquerque Indian School	0	0	0	
			40	8%
OFFICE				
Wingate High School	1	1	10	
Many Farms High School	2	2	17	
Phoenix Indian School	5	5	67	
Albuquerque Indian School	0	0	0	
			94	19%
TRADES & INDUSTRY				
Wingate High School	3	3	57	
Many Farms High School	4	4	99	
Phoenix Indian School	6	6	128	
Albuquerque Indian School	1	1	29	
			313	62%
GRAND TOTAL			508	

Table VII-9

Postsecondary Vocational Education
Courses and Enrollment

	# of Courses	# of Classes	# of Indian Students	% of Tot. Indian Students
AGRICULTURE				
Navajo Community College	4	4	71	
Northland Pioneer Community Col.	4	4	21	
San Juan Campus	0	0	0	
Adult Vocational Training Prog.	N/A	N/A	2	
			94	7%
DISTRIBUTIVE				
Navajo Community College	0	0	0	
Northland Pioneer Community Col.	2	2	10	
San Juan Campus	7	7	14	
Adult Vocational Training Prog.	N/A	N/A	5	
			29	2%
HEALTH				
Navajo Community College	7	7	104	
Northland Pioneer Community Col.	2	2	12	
San Juan Campus	1	1	3	
Adult Vocational Training Prog.	N/A	N/A	37	
			156	12%
HOME EC. OCCUPATIONS				
Navajo Community College	0	0	0	
Northland Pioneer Community Col.	0	0	0	
San Juan Campus	4	4	18	
Adult Vocational Training Prog.	N/A	N/A	20	
			38	3%
OFFICE				
Navajo Community College	9	9	101	
Northland Pioneer Community Col.	7	22	68	
San Juan Campus	2	5	20	
Adult Vocational Training Prog.	N/A	N/A	123	
			312	24%

* The number of classes for Northland and San Juan are estimates.

Table VII-9 (cont'd)

Postsecondary Vocational Education
Courses and Enrollment

	# of Courses	# of Classes	# of Indian Students	% of Tot. Indian Students
TECHNOLOGY				
Navajo Community College	3	3	26	
Northland Pioneer Community Col.	3	7	96	
San Juan Campus	1	1	2	
Adult Vocational Training Prog.	N/A	N/A	33	
			157	12%
TRADES AND INDUSTRY				
Navajo Community College	12	12	93	
Northland Pioneer Community Col.	1	40	207	
San Juan Campus	5	4	17	
Adult Vocational Training Prog.	N/A	N/A	211	
			528	40%
GRAND TOTAL			1314	

Table VII-10

Trades and Industry Secondary Schools
Courses and Indian Enrollment
Arizona and New Mexico, 1975-76

		ARIZONA		NEW MEXICO	
		No. of Students	% of Total Students	No. of Students	% of Total Students
0301	Auto Body	--	--	11	3%
0302	Auto Mechanics	72	32%	29	9%
0399	Auto Parts, Service	--	--	0	0
1000	Construction Maint.	13	6%	141	44%
1001	Carpentry	24	11%	0	0
1003	Heavy Equipment	--	--	0	0
1100	Custodial Services	--	--	0	0
1200	Diesel Mechanic	14	6%	--	--
1300	Drafting	8	4%	--	--
1400	Electricity	7	3%	--	--
1403	Electric Motor Repair	--	--	0	0
1700	Foremanship Superv.	--	--	-	0
1900	Graphic Arts	18	8%	--	--
1902	Printing Press Oper.	3	1%	--	--
2300	Sheet Metal	4	2%	--	--
2302	Metal Machine	7	3%	--	--
2306	Welding	37	16%	4	1%
2399	Metalwork/Jewelry	--	--	117	36%
2902	Cook/Chef	--	--	0	0
2903	Butcher	--	--	0	0
3100	Small Engine Repair	3	1%	18	6%
3600	Cabinetmaking	--	--	0	0
3601	Millwork	18	8%	--	--
9904	Indian Arts/Crafts	--	--	1	1%
TOTAL		228		321	

NOTE: Where there is a course and a zero, it indicates the course is offered, but no Indian students are enrolled, where there is a dash (--), no course is offered.

Source: Arizona Dept. of Career and Vocational Education.
New Mexico Dept. of Vocational Education.

Table VII-11

Trades and Industry Postsecondary Courses and Indian Enrollment 1975-76

		NORTHLAND COMMUNITY COLLEGE		SAN JUAN CAMPUS		NAVAJO COMMUNITY COLLEGE		ADULT VOCATIONAL TRAINING	
		# of Indian Students	% of Total	# of Indian Students	% of Total	# of Indian Students	% of Total	# of Indian Students	% of Total
0199	Air Conditioning, Other	7						1	
0300	Automotive Services	15	7%						
0301	Body and Fender	4	2%					1	
0302	Mechanics	16	8%	4	24%	14	15%	20	11%
0399	Automotive Services	2	1%	5	29%	24	25%		
0600	Xerox Maintenance							3	2%
0900	Photography							3	2%
1001	Carpentry	30	14%					3	2%
1003	Heavy Equipment							6	4%
1004	Masonry	24	12%						
1007	Plumbing	21	10%					2	1%
1200	Diesel							14	8%
1300	Drafting	19	9%			7	8%	14	8%
1400	Electrical	23	11%					13	7%
1501	Telecommunications							5	
1700	Building Construction							8	
1900	Graphic Arts							9	
2306	Comkin Welding	12	6%	8	47%	48	52%	48	26%
2602	Cosmetology							11	
2801	Fireman Training	9	4%						
2802	Law Enforcement	25	12%					6	
2900	Food Services							7	
3601	Millwright							1	
	Ironworker							3	
	Truck Driver							3	
	Offset Lithography							2	
	Meter and Relay							1	
	TOTAL	207		17		93		184	

Chapter VIII

Office of Education Involvement in Vocational Education Services to Indians

As our discussion of the distribution of funds in Arizona and New Mexico has indicated, specific problems exist in the manner in which the federal government has monitored these states to insure equitable allocations for programs serving Navajos. We find it difficult, for example, to accept the fact that in the case of Arizona, the federal government could say that the entitlement formula requires improvement, and yet not offer specific recommendations as to how it should be modified. 1/ In our view, this is sweeping the problem under the rug. Arizona vocational educators have expressed their willingness to modify their formula, if anyone could provide specific recommendations as to what a more equitable formula might be; yet no federal action ensued.

The problem in the distribution of federal funds in New Mexico has been even more severe from a legal standpoint, as we discussed. Yet no federal action was taken that would require a more equitable distribution of the federal funds, and it is not clear what action will be forthcoming to resolve past inequities.

It is also questionable whether the federal review of the two states' implementation of the disadvantaged and handicapped set-aside provisions has been carried out in sufficient depth to guarantee the needs of disadvantaged and handicapped students.

We are cognizant of the fact that this is not the first report in which the effectiveness of federal procedures for monitoring state action in vocational education has been questioned. Congress itself has been concerned about this activity and has included a provision in the pending vocational education legislation requiring that additional personnel be hired in BOAE to monitor the program.

The ambiguity of the federal role is an element of the more general argument about the extent to which federal education funds should be distributed to the state through a special revenue sharing mechanism rather than a categorical grant mechanism and the extent to which the federal government should play an interventionist role in education. Though vocational education is a categorical program, it seems to operate in the revenue-sharing mode. BOAE clearly views vocational education as a state program, retaining only a very limited federal role. This position appears to have moved them toward a posture of limited monitoring of state actions under the vocational education program and the imposition of few, if any, special conditions or sanctions. This federal posture has had a particularly negative impact on Indian tribes. There is a general consensus that states have not fulfilled their obligations to provide quality vocational education to the Indian people.

1/ Report of Special Review of Vocational Education Fund Allocation Procedures in Arizona, June 20, 1975, BOAE.

The response of some federal officials to these problems is to say that primary responsibility for the vocational education program rests with the states, and the federal role is secondary. Furthermore, they note that the states contributed about $6 to every $1 of federal money, thus diminishing the federal role and influence. In our view this response fails to accurately reflect the mandate given to the Bureau of Occupational and Adult Education by federal law and BOAE's own regulations. Taken to its most extreme conclusion, the response means that states can fail to meet federal standards with little fear that federal sanctions will ensue. Such a narrow federal role is particularly serious for "vulnerable" populations, minorities and the poor whose rights must be especially safeguarded if they are to be secured. For Indians, the problem is even more acute since antagonism between states and Indian tribes is an historical fact of life. As we stated earlier, without a strong federal presence, these rights are not likely to be fulfilled.

Our analysis indicates that this has been the case in Arizona and New Mexico. The federal government must act to remedy the inequities. It is not a question of how much federal money is involved; the issue is whether laws and regulations have been observed in both their spirit and intent. Nor are we arguing that the federal government ought to dictate all programs and program standards to the state. Without an equitable resource allocation system, however, such program issues become moot.

The House of Representatives' report discussing revisions of the Vocational Education Act states bluntly that "state boards of vocational education are failing miserably in meeting the needs of Indian citizens for vocational education." 1/ This is by no means surprising, since the relationships of states and Indian tribes have been marked by serious conflicts for many years. The states' failure to do an effective job in this regard must be considered in part a function of the failure of the federal government to monitor effectively the state activities.

The federal government's monitoring role may be even more important for Indian vocational education in the future than it has been in the past. The new vocational education legislation 2/ includes a provision which would set aside a portion of funds nationally for Indian tribes.

The amount of funds to be reserved for this provision is to be approximately equivalent to the same proportion of the vocational education appropriation as the population aged fifteen to twenty-four, inclusive, which is eligible to receive educational benefits as Indians from the Bureau of Indian Affairs is to the total population aged fifteen to twenty-four, inclusive, except that such amount shall not exceed one percent of such appropriation. It is anticipated that approximately $5 million should be available in FY 78.

1/ House Committee on Education and Labor, Report 94-1085, May 4, 1976.

2/ P.L. 94-482.

An important aspect of the provision is that the Commissioner of Education is instructed to first enter into contracts with any Indian tribe or tribal organization, if the tribe or tribal organization has contracted to administer any program under the Indian Self-Determination Act. The program contracted under the Self-Determination Act need not be an educational program; if a tribe is contracting for range management or employment assistance, it would be eligible for a vocational education contract. Activities which can be contracted include the planning, conducting and administering of vocational education programs and services. The contracts shall be subject to the terms and conditions of Section 102 of the Indian Self-Determination Act.

If, after all interested Indian tribal organizations have contracted for vocational education funds, there are funds remaining, the remaining funds will be transferred to the Bureau of Indian Affairs for the operation of vocational education programs in Bureau schools. For the purposes of the Vocational Education Act, the BIA is deemed a State Board, which means that the BIA will be required to match the amount of federal vocational education funds that it receives, a requirement of all State Boards for receiving vocational education funds.

This provision permits tribes a great deal of flexibility in determining the nature, scope and design of vocational education programs. A tribe could decide to run its own vocational education; another tribe might elect to develop the planning capability to be able to impact vocational education programs operated by public schools and the BIA. Tribes can contract for vocational education activities for any level--secondary, post-secondary or adult.

The provision does not, however, change the rights of Indian children to receive their fair share of vocational education funds which are allocated directly to the states. The funds set-aside for Indians are supplemental. Care must be taken by federal officials to assure that states do not view this set-aside provision as justification for diminishing their already limited contribution to vocational education for Indian students. Specific regulations should be developed to safeguard the rights of Indian people in this regard.

Therefore, not only should the federal government effectively implement the new Indian provision of the vocational education legislation, but it should take special care to assure that Indian people receive their fair share of funds which should rightfully be made available for the vocational education of their children. Any special Indian vocational education program unit within the Bureau of Occupational and Adult Education should assume responsibility for both of these functions.

Chapter IX

Analysis and Recommendations

The preceding review of vocational education programs serving the Navajo people depicts a system which fails to meet the real and growing needs. In reality, there is no vocational education system on the reservation.

This chapter highlights the major problems which exist in vocational education at the secondary and postsecondary levels on and near the reservation; an overall strategy for the resolution of these problems is described, and specific recommendations to the relevant agencies are presented. The strategy and recommendations are premised on a basic policy position which is consistent with national Indian self-determination policies. The Navajo Tribe, working through its elected officials and professional staff, has the primary responsibility for assuring that the resources of the various public and private agencies are mobilized to meet the extensive and unique vocational education needs of the Navajo people. The policy recognizes the tribe's inherent right as a sovereign unit of government to plan for its own needs. Non-tribal planners and service delivery agencies must recognize this right and develop their own policy and program to reflect tribal policy.

It must also be recognized, however, that if the tribe chooses to assert its right to self-determination in vocational education, it must assume the responsibility for eliminating the existing program fragmentation on the reservation and developing fully coordinated vocational education planning and programs. This entails organizing the various departments, agencies and institutions, e.g., NDOE, NCC, NOETA, state agencies, BIA, and local school districts through a coordinating planning mechanism. The tribe, i.e., the Chairman and/or the Tribal Council, should assign the Navajo Division of Education the responsibility for defining policies and objectiv in vocational education and give the Division formal authority to represent the tribe on vocational education issues. NDOE can then proceed to build an operational system.

Summary Highlights

A. Secondary Schools

The secondary level vocational education programs serving Navajo students can be characterized in the following ways:

1. The programs are inadequately financed.

Federal vocational education funds have not been distributed equitably by state vocational education departments. Therefore, many poor school districts are without adequate financial resources to provide needed vocational education programs and the results are evidenced quantitatively and qualitatively, by inadequate course offerings and deficient facilities and equipment. The BIA, in the absence of a policy on vocational education,

invests little money in secondary level vocational education, and therefore, what little is available in Bureau schools is, at best, prevocational education. In addition, special funds from Title I, Title IV, and JOM, which can legally be used for vocational education, have not been used for this purpose by the local school districts or the Bureau.

2. There is no coordination among local education agencies (LEAs) nor between the LEAs and the BIA. Given the high cost of vocational education facilities and equipment, effective planning and coordination among agencies is absolutely essential. At the present time, there is virtually no communication between the BIA and the public schools, and little in the way of joint efforts among the public schools. Geography undoubtedly is an inhibiting factor, but this problem could be addressed through better cooperation among participating agencies and the development of innovative strategies which respond to the reservation conditions.

3. Course offerings do not appropriately respond to labor market demands. Analysis of vocational education courses indicates that there are glaring deficiencies in meeting labor market demands. While the data used may not be as precise as one would like, they are the best data available. There is no question that better data on existing and emerging labor market needs must be made available for use in planning for appropriate training.

4. Inadequate resources are devoted to vocational education planning. Most local school districts cannot afford and do not spend significant time or resources on planning, and, therefore, little change occurs in courses from year to year. The States of Arizona and New Mexico have not required annual plans from their local education agencies on a regular basis; such plans are viewed more as a burden than as potentially useful working tools. In the Bureau of Indian Affairs, despite the availability of ample numbers of administrative personnel in the Area Office, no attention at all has been given to vocational education planning. The Navajo Tribe itself has no overall plan defining tribal needs for vocational education.

5. There is very little technical assistance available to local vocational educators who seek to improve their programs. In Arizona, where the relationship between the local districts and the state has been fraught with conflict in the past, only limited technical support has been forthcoming. The County Coordinator who is supposed to serve the reservation districts in Arizona has too many responsibilities to carry out his job effectively. In New Mexico, services are being provided only if requested, and these services are narrowly focused on specific subject areas, rather than dealing with generic planning issues. BIA school staff who are interested in improving the vocational education program simply have no place to turn because there is no vocational education policy or program unit in the Bureau, and no responsiveness to initiatives for dealing with the questions.

6. Availability of vocational education teachers. There is a paucity of trained vocational instructors in the isolated rural areas served by reservation schools. It is difficult for the local school districts to retain teachers due to the higher salaries paid by the BIA and the urban school districts. The lack of available instructors has meant the elimination of courses or the inability to create new courses.

7. There is an insufficient emphasis in the secondary schools on training for employment. The State of New Mexico is moving toward a policy of all but eliminating vocational training for employment in the secondary schools and focusing all its resources at the postsecondary level. Arizona, with its extensive community college system, appears to be operating similarly. The BIA secondary school offerings are at best, prevocational.

Yet the educators on the reservation expressed a need to provide more job-oriented vocational training at the secondary school level. The local communities on the reservation expressed the strong conviction that vocational education would encourage youth to stay in school. At the NDOE Hearings, Navajo parents expressed over and over their beliefs that vocational courses in the secondary schools are essential to retaining students in school and preparing them for jobs. In examining the secondary versus postsecondary level training issue, one must realize that many Navajos complete high school one or two years later than non-Navajos and marry earlier; therefore, employment becomes a more immediate and crucial issue. If they do not obtain basic occupational skills during high school, they are likely to be relegated to menial jobs on the reservation, or more likely unemployment, or they will have to leave the reservation in search of jobs elsewhere. A job-oriented vocational education program as part of a comprehensive secondary school system would also better prepare young Navajos for postsecondary training. Certainly data on the programs offered by the Bureau secondary schools indicate that the Bureau schools are neither preparing students for jobs nor for postsecondary vocational/technical programs.

With the absence of adequate vocational training at the secondary school level, the most viable option too often appears to be moving away from the reservation to urban areas to seek employment and/or training. This is all the more true when the training agencies and institutions encourage the departure unwittingly or in some cases wittingly by not providing adequate information about training opportunities available on or near the reservation. For many young people, this means a decision to leave the reservation, or migrate back and forth between off-reservation urban areas and the reservation. Final departure of young Navajo from the reservation means their loss to the Navajo Nation.

Special Note:

This study has not been able to examine in-depth the degree to which outmigration on a permanent basis is occurring. It is happening, however, and the design of certain programs has contributed to it. The tribe should establish a clear policy on outmigration. A thorough

review of the issues is required by the Navajo Tribe as part of its policy development process, because in the extreme it could threaten the sovereignty and the survival of the tribe. Without a clear policy, decisions of the tribe may inadvertently result in increased out-migration of tribal members who otherwise might have remained on the reservation. In the absence of a clear tribal policy, out-migration will occur due to external pressures such as federal and and state program policies, and national, regional and local labor market trends and conditions, as well as other factors.

B. Postsecondary Schools

Many of the problems which plague secondary level vocational education also exist at the postsecondary level. Course planning is inadequate; courses do not adequately respond to labor market needs; technical expertise and coordination are hard to find. In addition, there are some special problems that are unique to the postsecondary level.

1. There is little or no flexibility to deal with the problems created by the impact of state boundaries on programs and services available to reservation citizens. Each state and postsecondary institution has its own regulations and policies. It is a difficult task for the Navajo Tribe to overcome the obstacles which such regulations create for effective vocational education planning. The tribe's own lack of policy and its present staff capability provide little framework within which these problems can be resolved.

2. The Bureau's AVT program has precipitated a draining from the reservation of both the skilled labor force and the resources and funds that could have been used to build and support a permanent vocational training capacity on or near the reservation. Through its AVT policy and practice, the Bureau is to a large degree responsible for the absence of training alternatives for Navajo people on and near the reservation.

3. AVT has not utilized vocational education opportunities at community colleges on and near the reservation. These institutions have been successful in training people for employment on and near the reservation, yet AVT continues to send people off the reservation for training. The results of this policy are to further encourage the movement of Navajos off the reservation. In addition, the AVT program, as evidenced by the Career Development Center effort, does not work to develop comprehensive planning and program coordination mechanisms crucial to bring about a closer working relationship among the Bureau, the tribe, and the community colleges.

4. The Bureau lacks a coherent policy and program of postsecondary vocational education particularly in reference to the Bureau's Southwestern Indian Polytechnic Institute in nearby Albuquerque. The underutilization of SIPI appears to be largely a result of limited AVT referrals and the absence of a Bureau policy to recruit students for SIPI. The failure to utilize SIPI

properly and to link its programs with those at Haskell means that fewer resources overall are available for postsecondary vocational education, and fewer Navajo are able to obtain advanced skills for employment. The problem reflects dramatically the Bureau's default in the vocational education sphere.

5. The role of the postsecondary institutions near the reservation is somewhat unclear and hesitant because of the lack of clarity with regard to the role and mission of NCC. There appears to be an over-sensitivity on the part of the other community colleges to the unique role and responsibility of Navajo Community College as a Navajo institution. As a result the other community colleges are cautious to avoid the appearance of encroaching upon the prerogatives of NCC by taking the lead at the postsecondary level. At the same time, NCC has not adequately defined its own mission and goals in the vocational education arena, and is not adequately meeting the vocational education needs of Navajos. Consequently, there is considerably more potential for expanded programs at the postsecondary level than has been developed. Our review revealed a situation where, ironically, the advent of NCC has apparently and unintentionally served as an inhibiting factor in the development and expansion of other vocational resources at the postsecondary level on and near the reservation. Given the level of need on the reservation, there are viable roles which all the institutions can play, if NCC will clarify its own role, and move to create a coordinated approach to planning for postsecondary vocational education on the reservation.

C. Summary of Highlights

The resolution of the many problems which exist in vocational education is of vital importance to the future development of the Navajo Nation. If the Navajo Tribe is to develop the full capability of its labor force, the responsibility for achieving that goal must be shared by the various programs designed to prepare people for employment.

The tribe's Office of Employment and Training will never meet the needs of the population if it must continually fill the gap created by the lack of adequate training opportunities in the secondary schools. Students will not be able to take advantage of opportunities in postsecondary schools, and in fact, many will fail if the proper groundwork has not been laid at the secondary level. The costs incurred by not having a coherent and rational system that prepares individuals for employment are substantial both in human and economic terms. The present situation results in a Navajo labor force that is (1) inadequately trained for jobs on the reservation which are held by non-Navajos, and (2) ill-prepared to assume the jobs which are anticipated as a result of the development of natural resources and other economic development occurring on the reservation.

If the Navajo Tribe is to gain the desired policy and program control over all the resources offering training for employment on and near the reservation, it must do so in an organized and coherent manner. A framework for understanding and addressing the various components which prepare people for employment must be developed. The framework should describe training needs for Navajo people on and near the reservation, and analyze existing

training opportunities in relation to those needs. Specifically, the tribe, through NDOE, should identify at the secondary and postsecondary level:

a. The types of training that are needed on the reservation;

b. The training that is presently offered;

c. The additional training that is needed; and

d. The training that should be reduced and/or eliminated so that resources can be redirected to newer, more relevant programs.

Armed with this information, the tribe can then direct, negotiate, influence, or pressure the various deliverers of education and training services into a more rational vocational education system as the situation demands.

D. Strategy for the Establishment of a System of Secondary Vocational Education Networks

Based on our examination of the vocational education opportunities available to Navajo students, it is our recommendation that efforts to improve vocational education should focus initially on the secondary rather than the postsecondary level. There are several reasons for beginning at the secondary level: first, the tribe has more influence on the local school districts than on the postsecondary institutions which (with the exception of NCC) are located off the reservation. Secondly, good vocational preparation at the secondary level is important to future employment as well as student decision-making about postsecondary training opportunities. Secondary schools are less expensive for Indian students; Indian students marry earlier than white students, further complicating the postsecondary issue.1/

In order to maximize the use of existing facilities and equipment, be they the property and responsibility of public schools, BIA schools, or the tribe (after all, they are all there to serve Navajo students), the concept that should be applied is that of Vocational Education Networks designed to serve defined geographic areas. Under the Network model, all of the vocational education courses offered at all of the schools in a geographic area would make up the pool of vocational education courses available to an Indian student in any school in the area. The planning of new courses or elimination of outdated courses would be done for the geographic area rather than for an individual school. Such an approach should include the right of any student to be able to choose among courses offered not only at his/her own school, but encourage admission to courses offered at any school in his/her geographic area. In some instances, in order to develop a new program or improve equipment, financial contributions should be made by several schools, school districts, or the BIA.

Gaining the cooperation of the schools in a geographic area--schools which do not belong to the same system and have totally independent lines of authority and resources--will not be an easy task; there are many sociopolitical pressures at play which affect efforts to gain cooperation from the various agencies that have previously operated autonomously with little in the way of cooperative efforts.

The Navajo Tribe through the Navajo Division of Education is the logical agency for taking the initiative in coordinating the development of the Vocational Education Network concept, as it affects Indian students. Armed with the Indian Self-Determination Act and the authority to contract under new vocational education legislation, the tribe has access to

1/ A strategy for addressing postsecondary problems should emerge through the joint efforts of NDOE and NCC.

financial resources not available to other agencies. These resources can be used by the tribe as an incentive to secure the participation of those agencies in the Vocational Education Network. Possible sources from which the tribe could generate funds include:

1. Funds which will be available under the Indian set-aside provision of the Vocational Education Act: The Navajo Tribe can contract directly for this money to be used for any vocational education purpose, e.g., planning, program development, program operations, purchase of equipment, etc.

2. CETA funds available to the tribe: CETA funds could be allocated by the Navajo Office of Employment and Training Administration for vocational education programs similar to those which are now operating at the BIA Wingate School.

3. Adult Vocational Training Funds: The tribe, through NOETA, could contract the AVT program and use AVT funds to provide skill training to persons 18 years of age and over. The availability of AVT funds would enable NOETA to allocate the more flexible CETA monies to secondary level vocational education on the reservation. Such funds could open opportunities to youth and others who are students, as well as to those who qualify as adults.

4. State Vocational Education Funds: The tribe is in a position to act on behalf of local school districts to assist them to receive an appropriate share of vocational education funds from the states.

The complexities of securing agreement of the local school districts, the BIA, and the contract schools to participate must be clearly recognized at the outset. Public schools will not easily give up control over their vocational education resources. They may, however, be willing to accept a situation where they operate specific vocational education programs, with some of their students and students assigned from other schools participating, and allow the planning and evaluation of services for Indian students to be performed by the tribe. Such arrangements could be made without any transfer of funds.

The BIA would be expected to respond to the network approach if there is a unified tribal policy to create such Vocational Education Networks established by the Tribal Council and supported by the Chairman. The Self-Determination Act is available to the tribe as a means to insist upon cooperation and agreement by the BIA. Equally, if not more important, will be the securing of support from various groups within the tribe that have a vested interest in the education of Navajo young people.

Contract schools may also object to coming under any additional tribal influence, but if there are incentives in the form of more and/or better programs, financed through tribal-controlled dollars, there is a basis upon which trade-offs can occur and consensus achieved.

Thus, under the Vocational Education Network concept, the tribe would assume administrative/management responsibility. Specifically, tribal responsibilities would be:

a. Securing additional funding for the creation and operation of the Vocational Education Network, utilizing the aforementioned sources.

b. Building and maintaining consensus among the relevant schools and agencies in order to operate the Vocational Education Network.

c. Working with a steering committee representing participating schools and agencies to plan new courses or eliminate outdated courses through use of the most up-to-date labor demand information produced by the tribe and other accurate data sources.

d. Selecting the school site for new courses based on existing resources and facilities at the schools within the area. 1/

e. Making all necessary arrangements and, where necessary, providing resources to insure that students are transported to other schools to participate in the courses that they desire.

f. Monitoring the operation of Network on an ongoing basis.

In some instances there are facilities that are available to the tribe but not to schools (such as Skill Center training facilities). NDOE might choose to operate a vocational education course for Indian students living in the area utilizing the non-school facilities. Such tribally operated programs would have particular value in assuring that essential programs are available as well as demonstrating the viability of the Network concept, and the tribe's commitment to making the concept work.

1/ It is envisioned that schools will develop a specialized capability in a particular subject area and that the specialities would influence the particular school where a specific course would be located.

This strategy makes sense in light of what exists at the reservation schools and what is being planned. Vocational courses are presently being offered at Tuba City (Public), Fort Wingate (BIA), Fort Definance (Public), Chinle (BIA), and Crownpoint (Public). However, none of the vocational programs is sufficiently equipped or financed to provide a full range of courses needed on the Navajo reservation. In each case, facilities are being converted for vocational education purposes and in some cases, facilities are being constructed. Unless the vocational education needs of students in the surrounding geographic area are considered in the program planning process, the new courses are likely to duplicate those already available, the essential broader variety of courses will not be developed for Indian students, and the system will remain fragmented and unresponsive. The new facilities offer a unique opportunity to engage in a comprehensive vocational education planning process for three reasons:

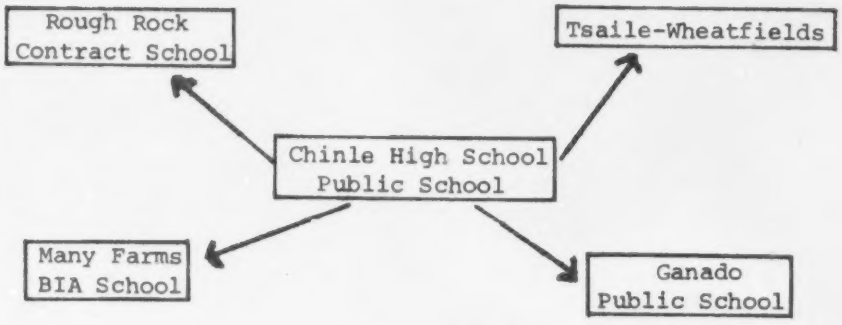
a. They are evenly distributed throughout the different BIA administrative (Agency) areas.

b. Other, smaller, secondary schools located within commuting distance of the larger central schools could develop vocational education resources available to supplement those of the major facility. (In many cases the distances involved are not more than 30 miles.)

Given these circumstances, the Vocational Education Network system could begin operations at one site in a reasonable time period. The responsibility for the operation of specific vocational education courses remains with the schools, while administrative/management responsibility rests with the tribe. A centrally located school would be made the administrative center for the Agency's Vocational Education Network. New courses could be added in response to occupational demand and student interest as exhibited in the geographic area. Once the specific course had been determined, a school would be selected depending on facilities and equipment.

The Chinle Agency can serve as an example of the approach which is proposed. The public high school at Chinle could serve as the administrative center, and provide the major resources in the area for vocational education with satellite centers located at Many Farms, Rough Rock, Ganado, and Tsaile-Wheatfields. Busing would be a relatively minor issue since no distance would be more than 30 miles. (See diagram, next page.)

Chinle Agency Vocational Education Network



This strategy offers an approach for rationalizing the inadequate secondary level vocational education system presently operating on the reservation. It will not be simple to design and implement. But if the agencies which are obligated to serve the Navajo people--whether public or private, state, federal, or tribal--could unite to assure that the best service is available, recognizing the tribe's inherent right to plan for its own people, it could work.

With this basic strategy in mind, we proceed in the following section to provide specific recommendations to the various agencies and organizations which provide vocational education and training to the area (and to the reservation).

We have ordered our recommendations in terms of the extent to which the tribe can actually control implementation of the recommendations. The chart in the Introduction (Figure 1) outlines the varying degrees of influence that the tribe has on critical agencies. In many instances, we will be making recommendations to tribal agencies that must also be implemented by state or local education agencies. These recommendations are repeated for both agencies. It is important to remember in this regard, that although the tribe must take leadership in activating the recommendations, the federal, state and local agencies are obligated under any circumstances to respond to the needs of the Navajo people and to respect the priorities defined by the tribe.

E. Recommendations

Navajo Division of Education

1. NDOE should develop a staff unit for vocational and career education in the Navajo Division of Vocational/Technical Education (NDVTE). Personnel in the unit should have the technical expertise to work cooperatively with all schools, agencies, and institutions that provide vocational education at the secondary level.

2. The NDVTE should pursue the design and development of the Vocational Education Network (VEN) concept as a first priority and begin implementation in the Chinle area immediately.

3. NDOE should initiate the development of a Vocational Education and Training Plan for the Navajo Tribe; the Plan should describe:

   a. The training presently being provided at all levels (secondary, postsecondary, and adult) on and near the reservation;

   b. The training that is needed to maximize opportunity for Navajos in positions on and near the reservation;

   c. Additional training that is needed;

   d. Training that should be reduced or eliminated because of duplication, inappropriateness, lack of demand, etc.;

   e. Training that should remain or be expanded.

   This plan should follow the development of the VEN concept. Such a Plan should be generated by NDVTE as quickly as possible using technical assistance and expertise as necessary to work with local school districts and state departments of vocational education.

4. NDOE should have responsibility to assure the implementation of the Vocational Education and Training Plan at the secondary school level; Navajo Community College should be assigned the responsibility of working with the postsecondary institutions and programs; and the Navajo Office of Employment and Training Administration should assume the responsibility for the manpower components of the Plan. A group composed of official representatives from each unit, chaired by NDOE, should be assigned the responsibility of integrating these three components, and eliminating duplication among them.

   Responsibility for working with the BIA AVT program eventually may have to be divided among different tribal departments, and,

therefore, no specific recommendation concerning this question is made here; however, responsibility for initial evaluation of the operation of the program should be assumed by NDVTE. (See AVT Recommendations)

5. NDVTE should take all steps necessary to assure that the BIA provides vocational education to students attending BIA schools in accordance with the Navajo Tribe's Vocational Education and Training Plan. The Bureau should first be required to:

   - Assure that its Navajo students can participate in vocational education programs in public schools as authorized by federal vocational education regulations. In order to make this possible, where necessary the Bureau should provide transportation. The Bureau should also utilize its vocational education funds to expand existing programs in public schools in which Navajo students could participate, especially in support of the Vocational Education Network concept. The Bureau should be discouraged from developing programs in its own schools that duplicate programs in other schools. Only if a program does not exist in any other school, be they BIA or public, should the Bureau establish its own vocational education program.

   To change the priorities in the Bureau schools, the tribe need not and, in fact in our view, should not contract to operate the school. Under the Indian Self-Determination Act, the Navajo Tribe has the authority to develop a plan for a vocational education program at a BIA school which would be accepted by the Bureau, subject to certain administrative limitations. (See Sect. 272.77, Self-Determination Act Regulations.) Thus the tribe can compel the Bureau to operate a vocational education program based on a tribal plan. If an expanded or new vocational education program is to be developed at a Bureau school, a detailed analysis of the budget for that school should be required, since priorities may have to be shifted in order to allocate additional funds to vocational education.

6. NDVTE should provide technical assistance to the local school districts in Arizona and New Mexico to:

   a. Review their vocational education course offerings in order to identify needed vocational education programs and outdated programs that are not needed and assist in the development of plans for the creation of newer more relevant programs. This activity should provide the basis for a local vocational education plan which is consistent with the Navajo Vocational Education and Training Plan.

b. Assist school districts in Arizona to apply for all vocational education funds for which they qualify. NDVTE should assist local districts to prepare applicants and assure that the applications are reviewed against stated criteria by the State Department of Vocational Education.

c. Provide training and technical assistance to Parent Committees of Title I, Title IV, and JOM programs. This training should be designed to assure that Parent Committees are informed of the options available to them to use these program monies to meet the special needs of Indian students for vocational education. Should the PACs decide on a program in the area of vocational education, NDVTE staff would be responsible for explaining how to develop and implement a quality vocational education program.

7. NDVTE should establish a close working relationship with the State Departments of Vocational Education in order to influence their activities. Particular effort must be made to influence state decisions with regard to the allocation of funds so that school districts serving Navajo children receive a fair share of funds. NDVTE should take strong initiatives with each state to assure that the states take the actions discussed below:

   a. The State of Arizona must revise its entitlement formula to take proper account of federal criteria; this alone would provide additional funds to Navajo school districts. Handicapped, disadvantaged and new program funds must be distributed on a more equitable basis, which would increase the funds available to reservation school districts.

   b. The State of New Mexico must remove federal vocational education funds from its equalization formula and use these funds to make up for the inequitable distribution procedures of the past. In addition, New Mexico should assure that local districts can develop new programs more responsive to labor market demands, and replace obsolete equipment to improve training available in ongoing programs.

8. NDVTE should act as a liaison between the several schools or agencies to facilitate agreements necessary to allow equipment and facilities to be used during out-of-school hours so that people who are not in school can also participate in vocational training.

9. NDVTE should work in cooperation with the Navajo Office of Employment and Training to expand the use of CETA funds for programs to prepare students in secondary schools for employment, such as the program which is now in operation at the Ft. Wingate BIA school.

10. NDVTE should examine the tribal teacher training program to determine if some of the resources allocated to that program could be redirected to preparing Navajos to become vocational education teachers.

11. NDVTE should participate in the development of regulations for the new provisions of the Vocational Education Act by commenting on the proposed regulations that permit Indian tribes to contract directly for "planning, operating and evaluating" vocational education programs. When funds become available, NDOE should move promptly to contract for the performance of those activities. The tribe's focus in such a contract should be on designing the Vocational Education Network.

Navajo Community College

1. NCC should develop the vocational/technical education planning capability necessary to define its own role and goals in the implementation of the Navajo Vocational Education and Training Plan. Such a planning capability would also help NCC to utilize its own resources for postsecondary and adult vocational education more effectively.

2. NCC should assume a leadership role in the Higher Education Consortium, encouraging the existing postsecondary institutions on and near the reservation to provide needed vocational education programs as identified in the Tribal Vocational Education and Training Plan and to eliminate programs that are not relevant. The strengths and resources of all institutions and programs will have to be utilized to their fullest in order to implement the plan.

Bureau of Indian Affairs

1. General

The BIA must organize a vocational education division which, in cooperation with tribal leadership, has the responsibility for defining a Bureau vocational education policy at the secondary and postsecondary levels, and to monitor the implementation of that policy.

2. Secondary Schools

a. The Navajo Area Office, in conjunction with NDVTE, should mold the national policy of the BIA to meet the special needs of the Navajos.

Any BIA planning or program development in vocational education programs must reflect the tribal Vocational Education and Training Plan, and be coordinated with the tribe. The Bureau must respect and adhere to the principles of self-determination.

b. The BIA education budget should be analyzed to identify funds which can be specifically earmarked for vocational education. A separate line item for vocational education in the Bureau budget should be created. The BIA should develop with the Bureau of Occupational and Adult Education a mechanism so that federal funds to states for which Indian students in Bureau schools have been counted, are utilized to permit Indian students to participate in existing vocational education programs. Any new programs should be complementary to existing programs and must be planned through the VEN agency model.

c. The BIA must insure that its students have access to already existing vocational education programs in the public schools, as authorized by Federal regulations, and provide transportation to facilitate their participation. Liaison with federal, state, and local agencies must be pursued to achieve this objective. Transportation costs would have to be shared to make such a system realistic.

d. BIA vocational education programs should be coordinated with on-going vocational education programs in local public schools so that a richer, more varied choice of vocational programs will be available to Navajo students. The Bureau should not replicate in BIA schools programs that are already offered in public schools.

e. The utilization of BIA school equipment and facilities after school hours should be encouraged so that vocational training is available to persons both in and out of the school system.

3. <u>BIA Postsecondary Schools</u>

a. The BIA should establish a line item in its budget specifically for postsecondary vocational education to facilitate proper consideration for such services, and the monitoring of services provided.

b. Vocational programs provided at all Bureau institutions must be coordinated to avoid competition and duplication and to provide training designed to prepare Navajos for employment opportunities on and near the reservation.

c. Relevant labor demand information must be utilized in course planning to assure that training is relevant to jobs on and near the reservation. More effective linkages between placement offices at Bureau institutions and reservation communities should be developed.

d. Full utilization of postsecondary facilities should be encouraged. Except where the programs are not offered at BIA postsecondary institutions, the vocational/technical resources of Bureau institutions, such as SIPI, are resources for Navajo youth and, therefore, should be used to their full capacity before outside proprietary schools are used for training.

e. A monitoring and feedback system that reflects the number of people applying for training, what they are being trained for, and relevant follow-up information such as subsequent employment, place of employment, relevance of employment to training, length of employment, satisfaction with training and employment, must be instituted in order to evaluate the appropriateness of available training programs.

4. BIA Adult Vocational Training Program

a. The BIA should establish and implement a policy for the Adult Vocational Training Program which makes the use of its resources to support postsecondary institutions and other training resources on and near the reservation a priority, and not encourage in any way the relocation of persons off the reservation.

b. The Employment Assistance Branch in the BIA, which is responsible for the AVT program, as well as the Career Development program, must take its lead from the Navajo Division of Education and the Navajo Office of Employment and Training Administration in its planning and program development efforts. They must recognize the requirement to respond to tribal policies, goals, and priorities. Pointedly, the BIA must see itself as designing a program which is responsive to tribal priorities rather than inviting the tribe to respond to

Bureau initiatives and program designs. If BIA programs are not planned and developed in conjunction with the tribe, then BIA funds will not be utilized to achieve maximum impact.

Should an effective working relationship between the tribe and the BIA with regard to the tribal role, not develop, the tribe should contract to operate the AVT program in the future under the provisions of P.L. 93-638. In fact, because of the total absence of coordination between the Bureau and the tribe, contracting the AVT program may be the most effective approach to making best use of these resources. This is particularly true where funds are needed to implement the Vocational Education Network concept. The other possible alternative, would be for the tribe to develop a plan for operation of the program which the Bureau, under the Self-Determination Act regulations (272.27) would be obligated to follow in its administration of the program.

Should the tribe choose to contract or plan for AVT, a very careful planning process is required given the complex issues involved. Questions such as the following will have to be addressed:

- Should the tribe set limits on the Bureau for sending people off-reservation for training?
- How much of the AVT funds should be allocated to adults in skill training programs as opposed to young people in postsecondary institutions?
- How much of the AVT funds should be used for adult programs operated in public or Bureau vocational facilities in the evening?
- To what extent will AVT funds be used to operate the Navajo Residential Skills Center?

These and other questions must be carefully considered by the tribe in reaching its decision on the AVT program.

c. If necessary, the AVT law and/or regulations should be revised to permit AVT funds to support vocational training at community colleges, in recognition of the value of vocational training offered as part of a postsecondary educational program.

d. AVT must encourage the full utilization of existing facilities and equipment on the reservation by arranging with the BIA and/or the public schools to operate adult vocational training programs during hours when the facilities and equipment are not being utilized by secondary or postsecondary classes.

e. AVT should make a priority the relocation of teachers and instructors to institutions on or near the reservation rather than the relocation of Navajo people off the reservation.

f. AVT must establish and maintain a central information system that reflects the number of people applying for training, what they are being trained for, where they are being trained, and relevant follow-up information such as subsequent employment, place of employment, relevance of employment to training, length of employment, satisfaction with training and employment.

Recommendations to Arizona and New Mexico Departments of Vocational Education

1. The State Plans should include a provision which recognizes that the state and local school districts will accept tribal priorities for secondary vocational education, as a basis for their own planning and decision-making in providing services to Navajos.

2. The states must require rational vocational education planning at the local level. Comprehensive planning on a three-year basis would be acceptable, so long as there is a requirement for an annual review of the plan to make revisions as necessary. Without such a planning process, course offerings are likely to remain unresponsive to labor market conditions, and strategies such as the Vocational Education Network will be far more difficult to implement. The states should also provide the training and technical assistance necessary to assist local districts with their vocational education plans so that the needs of each district are clearly defined.

3. Vocational education funds should be focused on vocational training leading to employment; vocational education funds should not finance career awareness programs at the junior high school level until there are sufficient training alternatives available in high school to offer students realistic choices for employment opportunities on or near the reservation. However, at the secondary level, the full range of occupational areas available to the student upon completion of high school should be explored, so that students are aware of all realistic opportunities for employment and/or training on and near the reservation.

4. BIA students should be permitted to participate in public school vocational education programs as intended by federal vocational education regulations on private non-profit schools. Funds should be provided for transportation of students to insure that this is possible.

5. Public school facilities and equipment should be made available after school hours to permit persons out of school to obtain vocational training.

6. The states should publish in their State Plans the amount of funds they have allocated to local school districts for each of the different funding categories to enable the public and the school districts to determine whether there is any reason to question the decisions of the states concerning their allocation of funds.

Specific Recommendations to the State of Arizona

1. The entitlement formula must be revised to include more appropriate criteria and more accurate data. A more equitable allocation of disadvantaged, handicapped, new program, and other discretionary grant funds must be made to reservation school districts.

2. More specialized technical assistance must be provided in vocational education planning and program development to school districts serving the Navajo Reservation. Specifically, a Coordinator's position, serving only the reservation school districts with particular emphasis on the school districts in Apache and Navajo Counties should be created. If Coconino County chooses to retain a separate local Coordinator this should be possible. The Apache/Navajo reservation Coordinator should be assigned to NDOE to function as a member of the staff of the Navajo Division of Vocational-Technical Education. Funds for creating the Coordinator's position in NDOE should be provided through an agreement with the state, the participating local school districts, and NDOE.

3. State Plan criteria for funding of new programs should be revised to provide more flexibility to school districts that give priority to programs needed by the local district rather than to state established priorities. Training in the occupations that are emerging in underdeveloped areas of the state should have the highest priority in the funding process.

4. Postsecondary vocational education designed to train Navajos for jobs on and near the reservation through the state's community college system must be available and accessible to the reservation community. Funds that permit students residing in counties where there is no community college to attend community colleges in other counties must be used for this purpose.

Specific Recommendations to the State of New Mexico

1. The state system for allocating federal vocational education funds should be modified in the following manner:

   a. The federal vocational education funds should be removed from the equalization formula.

   b. The federal vocational education funds should be distributed on an equitable basis to cover capital costs for new or additional facilities and equipment and distributed in a manner that makes up for the past years of inequitable distribution of funds.

   c. Disadvantaged and handicapped funds should be distributed to local school districts for students in those areas of the state with the highest concentration of such students.

2. Postsecondary vocational education should be made available and accessible to the reservation community on an equal basis with other parts of the state.

Bureau of Occupational and Adult Education

1. BOAE should provide specific recommendations to states as to how their formulas should be revised and work directly with them to insure that the revisions occur so they are brought in line with federal regulations and standards.

2. BOAE must monitor the allocation of disadvantaged and handicapped funds in Arizona and New Mexico and insist that they be allocated equitably within the states and in accordance with the law and regulations.

3. BOAE should insist that because the states count Indian students in BIA schools in their population in obtaining vocational education funds from the federal government, the states must make resources available to such students, and provide the means for those students to participate in programs through the authority of the private non-profit school provisions of the regulations.

4. BOAE should require states to publish in their State Plans or amendments thereto the amount of funds they allocate to local school districts for all funding categories established by the state. Only then will the public, the local school districts, and all vulnerable populations (including Indian tribes) be in a position to hold the states accountable for the manner in which funds are allocated.

Special Recommendations Concerning Implementation of Indian Provision of Vocational Education Legislation

1. BOAE should undertake careful planning to assure that Indian tribes are able to take full advantage of the new set-aside provision of the vocational education legislation. More specifically:

   a. BOAE should not delegate its responsibility under the Vocational Education Act of 1976 to the BIA.

   b. BOAE should create a special office for the management of the Indian set-aside. In addition to managing this program, the office should be responsible for (1) monitoring the actions of state vocational education departments to assure their accountability to the needs of Indian people; and (2) coordinating with the Bureau of Indian Affairs to begin to develop a rational federal vocational education policy for Indian tribes.

   c. Funding of Indian programs should not be on an annual basis. Funds should be guaranteed for at least a three-year period to enable tribes to develop their capabilities in this area and to impact other vocational education agencies. An annual competition for funds will not create the necessary vocational education capability within the tribes, and will fail to achieve the intent of the legislation.

   d. BOAE should place a priority on those projects which reflect an effort by tribes to coordinate the resources of BIA and public schools into a comprehensive vocational education system rather than funding narrow specific vocational training programs. The latter programs, though of great importance, do not enable Indian tribes to tap the full range of resources which are available and which must be martialed if their vocational education needs are to be met.

   e. There are more than 480 federally recognized tribes; only 72 have populations over 1,000 and only 38 have populations over 2,000. Approximately 150 hold contracts with the BIA and, therefore, qualify for contracts under the Indian provision of the vocational education legislation; but many of these tribes are too small to take advantage of the funds. BOAE must develop a set of criteria for distribution of funds which takes into consideration both the populations and needs of different tribes.

f. Special efforts must be made to assure that Indian tribes are informed of the opportunities available in the new Indian set-aside program. Publication in the Federal Register alone is not sufficient since many people do not see the Register or understand it when they do. Furthermore, since many tribes will not have the technical expertise to take most effective advantage of the legislation, BOAE must develop technical assistance programs for any tribe interested in planning, conducting, or evaluating vocational education programs. A major focus of the technical assistance should be to provide Indian tribes with sufficient knowledge of vocational/technical programs that the tribe may utilize the funds to coordinate any new programs with ongoing programs in local school districts serving the tribe.

g. BOAE should insure by regulation that the set-aside provision for Indians in the vocational legislation does not in any way diminish the obligation of the states to provide vocational education funds to Indians to which they are entitled under the basic grants to the states. (Subpart 2, P.L. 94-482.)

Appendix A

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Appendix B

LIST OF INTERVIEWEES

Navajo Tribe

Leonard Arviso, Director Navajo Office of Employment and Training
Eddie Tso, Assistant Director, Navajo Office of Employment and Training
Tom Brose, Director, Navajo Office of Labor Relations
Eric Natwig, Chief of Program Planning, Navajo Office of Program Development
Ronald Faisch, Director, Navajo Office of Research and Statistics

Education Committee, Navajo Tribal Council

Robert Billy
Harvey McKerry
Kenneth Dennison

Office of Education, Department of Health, Education, and Welfare

Edwin Rumpf, Director, Regional Coordinator, BOAE, Washington, D.C.
Michael Bruestein, Attorney-Advisory, Office of the General Counsel, HEW
Ed Pressen, Program Specialist, Title IV, Part A
Marie Emory, Program Specialist, Title IV, Part B

Arizona Department of Career and Vocational Education

Eugene Dorr, Associate Superintendent for Career and Vocational Education
William Anderson, Deputy Associate Superintendent, Vocational Education Administration Services
Stewart Miller, Director, Adult Vocational Education Services
Beverly Wheeler, Director, Research Coordinating Unit
Al Kohn, Accountant, Vocational Education Accounting
Eve Korresel, Statistician, Vocational Education Enrollment
Paul Bennewitz, Deputy Associate Superintendent, Career Education Administration

Arizona State Advisory Council for Vocational Education

Peter Holmer, Sr., member, Advisory Council

Arizona State Community College Board

J. R. Cullison, Executive Administrator for Vocational/Technical Education.

Apache/Navajo County Coordinator

Earl Patterson

New Mexico Division of Vocational Education

Wilma Ludwig, Director
Roger Labodda, Director, Research Coordinating Unit
Jim Parker, Assistant Director, Research Coordinating Unit
Carlos Gonzales, State Supervisor, CETA Vocational Education
Elouisa Labota, Finance Officer, Vocational Education

New Mexico Bureau of Educational Finance

Bill Witter, Postsecondary Coordinator

New Mexico Department of Finance and Administration

Jesse Rogers, Administrative Assistant to Chief, Public School Finance

Utah

Dr. Melvin Walker, Director, Vocational Education, San Juan School District
Joe Lyman, Director, Career Center, Blanding, Utah
Notah Tahy, Director, Education Division, Utah Navajo Development Council
Jack Jewell, Principal, Aneth Community School

Local School Districts

Jack Henderson, Vocational Education Director and District Representative, Window Rock School District
Richard Stahl, Director of Instruction and Personnel, Ganado School District
Alan Harvel, Director of Vocational Education, Ganado School
Donald Coffland, Director of Vocational Education, Tuba City High School
Jay Foley, Business Manager, Tuba City Unified School District
Al Cooper, Assistant Superintendent, Tuba City Unified School District
Dean Stotts, Principal, Winslow High School
F. A. Dahlen, Superintendent, Winslow School District
James C. Freeman, Assistant Superintendent, Winslow School District
Bill Peale, Vocational Education Coordinator, Gallup/McKinley County School District
J. W. Sprangler, Principal, Kirtland Central High School

San Juan Campus, NMSU

Glen Gabeheart, Dean, Vocational/Technical Division

Northland Pioneer Community College

Edwin Sorensen, President
Jimmie Allen, Director, Non-Credit Programs

College of Ganado

Thomas Jackson, President
Gretchen Peniska, Funds Development

Navajo Community College

Ralph Davis, Director of Special Projects
Eva Benally, Director, Shiprock Branch
Ray Houch, Farm Training Coordinator

Southwestern Indian Polytechnic Institute

John Peterson, Superintendent
Rosemary Knoki, Research Specialist
James Lujan, Education Specialist, Albuquerque Area Office

University of New Mexico - Gallup Branch

Calvin O. Hall, President

Bureau of Indian Affairs

Dr. Robert Hall, Chief, Division of Continuing Education
Max Harriger, Indian Education Research Center
Tom Hopkins, Phone interview, Indian Education Research Center
Martha Hearst, Education Specialist, Navajo Area Officer
Mark S. LaFollette, Employment Assistance Officer, Navajo Area Office
Michael Smith, Area Program Officer, Employment Assistance, Navajo Area Office
John Jolly, Chief, Division of Job Placement and Training, BIA, Wash., DC
John Wheeler, Program Analyst, Adult Vocational Training, Job Placement and Training, BIA. Washington, D.C.

Wingate High School

Doris Belinte, Guidance Counselor
John Thomas. Industrial Education Supervisory

Albuquerque Indian School

Keith O. Lamb, Superintendent

Haskell Indian Junior College

Bill Burgess, Dean of Instruction
Everett Bowman, Vice President

Northern Arizona Council of Governments

Stan Walker, Director of Field Operations

Four Corners Regional Commission

Bosco Kripokapich, Technical Assistance Coordinator

Navajo Tribal Utility Authority

Raymond Graymountain, Training Coordinator